

Revised Environmental Assessment and "Nationwide" Programmatic Section 4(f) Evaluations

Middle Fork Flathead River - SE Essex

BR 1-2 (85) 180

Flathead County, Montana



Prepared By
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**U.S. Department of Transportation
Federal Highway Administration
and the
State of Montana Department of Transportation**



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REVISED ENVIRONMENTAL ASSESSMENT
and
“NATIONWIDE” PROGRAMMATIC
Section 4(f) EVALUATIONS

for
Middle Fork Flathead River - SE Essex
BR 1-2 (85) 180; Control No. 1763
Flathead County, Montana

This document is prepared in conformance with the *Montana Environmental Policy Act (MEPA)* requirements and contains the information required for an Environmental Assessment under the provisions of ARM 18.2.237(2) and 18.2.239. It is also prepared in conformance with the *National Environmental Policy Act (NEPA)* requirements for an Environmental Assessment under 23 CFR 771.119.

Submitted pursuant to:

42 U.S.C. 4332(2)(c), 49 U.S.C. 303 and
Sections 2-3-104, 75-1-201, M.C.A.

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I. Description of the Proposed Action

I. DESCRIPTION of the PROPOSED ACTION

A. Project Location

This proposed project is located 0.4± kilometers (km), or about 0.25 miles, southeast of Essex at Reference Post 180.399 on Primary Route P-1 in Flathead County. Primary Route P-1, also designated as U.S. Highway 2 (US 2), is part of the National Highway System (NHS) in Montana. The existing bridge over the Middle Fork of the Flathead River is located within the NorthWest ¼ and the SouthWest ¼ of Section 14; Township-29-North, Range-16-West, M.P.M. The location of this river crossing is shown in **FIGURE 1**.

The project area generally extends from Reference Post 180.2± to Reference Post 180.6± on US 2. This section of highway winds through heavily forested and largely undisturbed mountainous terrain and is bordered by Glacier National Park and by the Flathead National Forest. The Great Bear Wilderness is located within the Flathead National Forest south and west of the project area. The Middle Fork of the Flathead River forms the boundary between Glacier National Park and the Flathead National Forest which are situated on the east and west sides of the river, respectively. Other notable features of the area include:

- ☐ **Middle Fork of the Flathead River Wild and Scenic River.** The Middle Fork of the Flathead River is part of the National Wild and Scenic River system. This reach of the Middle Fork is managed as a Recreational River by the U.S. Forest Service (USFS) Flathead National Forest and the National Park Service (NPS)-Glacier National Park.
- ☐ **Walton Ranger Station.** The ranger station is located in Glacier National Park and is immediately southeast of the existing bridge. The NPS ranger station and several other related structures comprise a Historic District recorded in the National Register of Historic Places.
- ☐ **Dispersed recreation area on the Middle Fork.** A dispersed recreation area is located on the west side of the Middle Fork immediately upstream from the existing bridge on Flathead National Forest land. This area is used as a put-in/take-out site for floaters on the river and as a site for fishing and camping. The site contains no improvements and is not managed as a campground by the USFS.
- ☐ **Parma Subdivision.** A small residential subdivision is located northwest of the existing bridge above the road cut for US 2. The Parma Subdivision is situated near the community of Essex on private land that was once part of the Flathead National Forest.

PLATE 1 presents photographs showing the general project area.

B. Project Description

The Montana Department of Transportation (MDT) plans to build a new bridge and approaches

across the Middle Fork of the Flathead River and remove the existing structure at the completion of construction. The proposed project would replace the existing 9.1±-meter-wide (30.0±-foot-wide) five-span structure with a new four-span bridge capable of carrying a 12.0±-meter-wide (40.0±-foot-wide) roadway and meeting current geometric design and earthquake design standards. The proposed bridge would be constructed on an alignment slightly upstream from the present structure. The new bridge would virtually eliminate the existing curved alignment at this river crossing, increasing sight distance and traffic safety. Since the bridge is located in an area with significant risk of a serious earthquake, an earthquake analysis is a requirement of the design. The bridge would be designed to conform to MDT's "Bridge Design Standards" and current AMERICAN ASSOCIATION OF STATE HIGHWAY AND TRANSPORTATION OFFICIALS (AASHTO) Standard Specifications.

Approximately 400 meters (m), or 1,300± feet, of US 2 on the approaches to the new bridge would be reconstructed. The approach work would begin 200± m (650± feet) north of the new bridge and end 200± m south of the structure. The new approaches would be 12.0± m (40.0± feet) wide at the bridge ends and transition to match the 10.4± m (34.0± foot) existing width of US 2 at the beginning and end of the project. The approach work north of the new bridge would include the installation of curb and gutter along the west (Essex) side of the road. The use of curb and gutter at this location would avoid excavation of a steep and somewhat unstable existing roadside slope.

The proposed project also includes activities such as: acquiring new right-of-way, relocating conflicting utilities, clearing and grading, providing a work bridge for use during the construction of the new bridge, signing and striping, seeding, and other miscellaneous items. Guardrail would be installed for the bridge ends and at appropriate locations along the approaches to the bridge. Provisions for pedestrians and bicyclists to cross the bridge would be provided.

The project is considered to be in mountainous terrain since grades on either side of the bridge range from 5 to 7 percent. Therefore, the horizontal and vertical alignments for the project would be designed to meet the requirements for a design speed of 80± km/hr (about 50 mph), consistent with standards for principal arterial routes in mountainous terrain as outlined in MDT's "Geometric Design Standards." The proposed vertical alignment would meet this design speed; however, the new horizontal alignment exceeds this standard and would meet a design speed of 100± km/hr (about 60 mph).

Lands within the Flathead National Forest and Glacier National Park would be disturbed by this proposed project. Approximately 0.95 ha (2.36 acres) of land on the USFS side of the river and 0.52 ha (1.29 acres) on the NPS side would be within the construction limits for the proposed project. Existing approaches to the dispersed recreation site along the west side of the Middle Fork and to the Walton Ranger Station would be perpetuated. A new approach and a segment of gravel-surfaced road would be constructed from US 2 to maintain access to the dispersed recreation site on the Middle Fork. The existing approach to the Walton Ranger Station from US 2 would be modified as needed.

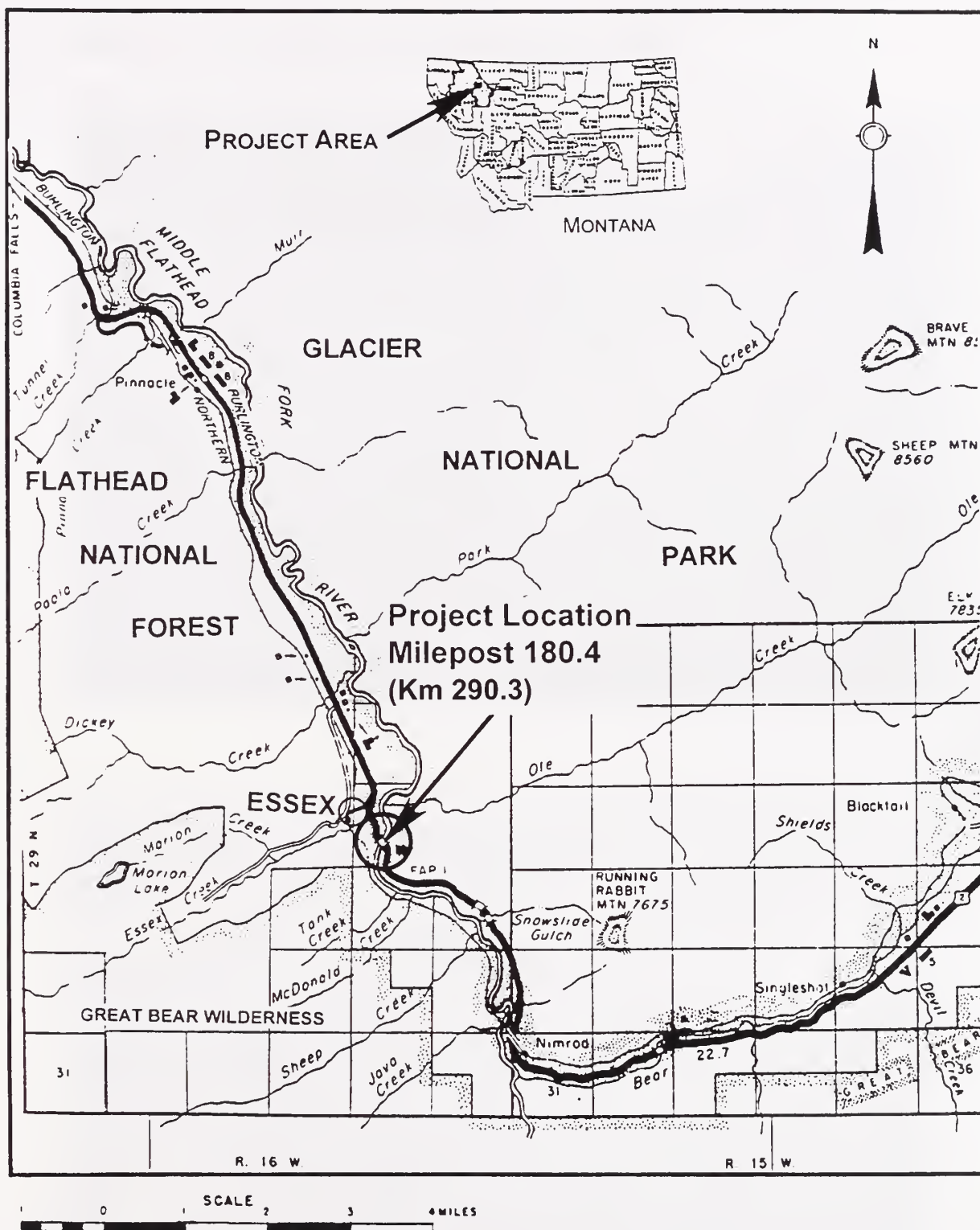


Figure 1
Project Location
Middle Fork Flathead River - SE of Essex

Plate 1: Photographs of Project Area

Photo 1: View of the existing bridge and terrain to the south from the top of a slope above US 2.



Photo 2: Looking northeasterly (downstream) from the existing Middle Fork bridge pedestrian walkway.



II. Purpose and Need for Action

II. PURPOSE and NEED for ACTION

A. Background

This project to replace the existing bridge over the Middle Fork of the Flathead River has been proposed because the structure shows high levels of deterioration in its deck and does not meet current earthquake design standards. The existing bridge was constructed in 1968 to replace the structure destroyed during massive flooding in 1964. The bridge was built by the U.S. Department of Commerce, Bureau of Public Roads as part of the ERFO 44 3 project on US 2. "ERFO" is an acronym for Emergency Relief on Federally Owned roads.

Routine inspections during the early 1990's found the bridge's deck to be in poor condition and noted other problems with its beams and with guardrails on the structure and its approaches. To remedy these identified problems, MDT began work on a project to rehabilitate the bridge deck, add safety improvements, and make the structure more resistant to earthquakes. The project started in 1994, but work soon stopped because the deterioration in the deck was much worse than first suspected.

The fundamental purpose of this project is to ensure continuing and safe travel for users US 2. A sudden, catastrophic collapse of the bridge would be very likely in the case of an earthquake. A bridge failure or a forced closure due to structural inadequacies could halt all through traffic on US 2 between East Glacier (43.6 km or 27.1 miles to the east) and West Glacier (46.5 km or 28.9 miles to the west). This would be a major inconvenience to the traveling public and require lengthy detours via other east-west routes in Montana or in Canada for the duration of the road closure. The lengths of these detours would range from about 490 km (310 miles) for the most direct alternate route in Montana to more than 670 km (420 miles) for travel via Canadian highways.

B. Current Deficiencies of the Bridge

The existing two-lane, 225.6± m long (744.0± feet) by 9.1± m wide (30.0± feet) bridge is a five-span steel girder structure. The current bridge has two girders supporting two lines of longitudinal stringers in the main spans, and has a prestressed concrete beam span on its northerly end.

The majority of the superstructure, or upper load-carrying portion of the bridge, rests on two, welded-plate steel girders. Bridge engineers refer to such a design as "fracture critical." Steel girders have the potential to develop cracks caused by fatigue loading, or repeated cycles of loading and unloading. In a fracture critical system, the development of fatigue cracking in one location can lead to collapse of the whole superstructure, as the remaining structure alone cannot carry the load.

Each girder on the bridge has two joints along its length. The connections across those joints are made by a "strap and hangar." This type of connection consists of a "strap" made of heavy plate steel that connects a steel pin, or large bolt, in each of the two sections of girder that meet at the

joint. This type of connection matches exactly the structural detail the Connecticut Department of Transportation identified as the failed element that led to the collapse of the Mianus River bridge several years ago, causing a number of fatalities.

The existing structure has a number of vulnerabilities that make collapse likely during an earthquake. Based on MDT's analysis, concerns exist regarding the seismic instability of the existing bridge's pilasters and the rocker bearings and the columns under the pier cap at Pier 2. The present structure also displays vulnerability to earthquakes at the connection of the pier columns to the pier caps at Piers 3, 4 and 5, at the footings at Pier 3 and 4, and at the bearing shoes at Abutment 6. Worse, analysis work has shown that if MDT fixed these identified problems, other problems would likely emerge as mechanisms of collapse in case of an earthquake. In short, trying to retrofit the existing structure to sustain an earthquake is not a realistic option.

MDT routinely evaluates the structural condition and functional adequacy of highway bridges to rate each structure's ability to meet the transportation needs of the public. The rating system, called the Sufficiency Rating (SR), is a composite of several ratings of individual items that consider the structural condition and geometry of the bridge. A bridge with a low rating on structural items will be designated as structurally deficient and a bridge with a poor rating for geometry items will be designated as functionally obsolete.

A copy of a recent (1994) *STRUCTURE INVENTORY AND APPRAISAL* form for the bridge over the Middle Fork of the Flathead near Essex can be found in APPENDIX C. The overall SR at the time of the 1994 inspection was 73.8 on a 100-point scale. The most recent SR for the bridge is 66. MDT considers this bridge to be both structurally deficient and functionally obsolete.

Another deficiency of the existing bridge is its ability to adequately accommodate bicyclists. Although the current bridge has a $0.9 \pm$ m (3.0-foot) wide sidewalk on one side, the structure accommodates only a $9.1 \pm$ m (30.0-foot) wide roadway with two $0.9 \pm$ m (3.0-foot) wide shoulders available for use by bicyclists. According to AASHTO guidelines and MDT's road design standards, shoulders at least $1.2 \pm$ m (4.0 feet) wide should be provided to allow for bicycle use.

The existing bridge deck was constructed with an "experimental" form of lightweight concrete. Past deterioration of the bridge deck suggests the use of lightweight concrete may not have been as successful as hoped for at this location. The existing bridge deck is in very poor condition and is rapidly deteriorating. Extensive repairs to the deck are imminent. Such repairs will be both expensive and disruptive to traffic on US 2. The present bridge was designed for a useful life of 50 years. By the time MDT plans to let the contract for the construction of the proposed bridge, the structure will have been in service for more than 30 years, or for more than 60% of its useful life.

PLATE 2 highlights several deficiencies associated with the existing bridge.

Plate 2: Existing Bridge Deficiencies

Photo 1: The curved alignment of the bridge is a contributing factor to accidents, particularly in the winter.



Photo 2: The bridge's superstructure is "fracture critical" and it's girders have undesirable strap and hangar connections



C. Traffic Safety and Efficiency

1. Traffic Safety

An accident analysis for this project showed that a total of 11 accidents occurred on US 2 between Reference Posts 180.2 and 180.6 during the ten-year period beginning on January 1, 1986, and ending on December 31, 1995. Ten of the accidents occurred on the bridge. Of these accidents, nine involved single vehicles, five involved striking the guardrail on the bridge, and seven involved icy road conditions. Due to the limited length of the project area and the specific nature of the accidents associated with the Middle Fork bridge, comparison of accidents statistics for this site with statewide accident and severity rates would not be meaningful.

The NPS evaluated the Middle Fork bridge and adjoining section of US 2 in its *Traffic Safety Study Glacier National Park, Montana*. The 1994 traffic safety study identified the Middle Fork bridge area as one of ten road system locations in Glacier National Park that merited attention based on the site's accident history over a four-year period beginning in 1990. The study analyzed accidents at the site and made recommendations to improve traffic safety.

2. Transportation Demand

US 2, also known as the "Theodore Roosevelt Memorial Highway" in the general vicinity, is the northernmost National Highway System (NHS) route in the United States. Montana has the most mileage of any state on this NHS route with nearly 1,070 km (665 miles) between North Dakota and Idaho. US 2 has been in continuous service (except for periods of floods, avalanches, repairs, or new construction) for more than seventy years. This route is also the only major east-west corridor across northern Montana. As such, the route provides an important regional link for commercial and emergency services traffic and serves international carriers traveling to and from Canada.

US 2 is the primary travel route to Glacier National Park from locations in the United States and can be used to access the Great Bear Wilderness, the Flathead Wild and Scenic River system, and lands within the Flathead and Lewis & Clark National Forests. The route is the only year-round vehicular access from the Blackfeet Indian Reservation to the west. US 2 serves as an essential transportation link for agencies and jurisdictions undertaking management activities on public and Tribal lands along this corridor.

This part of US 2 also parallels the Burlington Northern Santa Fe Railroad's main line, a Montana Power Company gas transmission line, and AT&T and US West Communications telecommunications lines. This route provides the principal vehicle access for maintaining these transportation, utility, and communications facilities.

3. Traffic Volumes

Historical records show that traffic on this section of US 2 has increased substantially since 1982. Based on information collected at MDT's permanent traffic counters, average daily traffic

(ADT) volumes west of Browning (at Station A-36) increased from 1,480 vehicles per day (vpd) in 1982 to about 2,240 vpd in 1995. This data means that the 1995 ADT volume on US 2 west of Browning was more than 50% higher than recorded 14 years earlier at the same location. ADT volumes at Station A-60 west of Hungry Horse increased from 3,549 vpd in 1982 to 6,305 vpd in 1995. This data shows that ADT volumes in 1995 at Station A-60 were about 80% above those recorded in 1982.

Existing traffic volume data for US 2 was reviewed and used to develop estimates of current and future traffic volumes for the project area. Design traffic data for this section of US 2 is summarized in **TABLE 1**.

Table 1: Current and Future Traffic on US 2 Middle Fork Flathead River - Southeast of Essex	
Current Average Daily Traffic (ADT)	1,360 vehicles per day
Year 2010 ADT	1,790 vehicles per day
Year 2030 ADT	2,660 vehicles per day
Trucks (T)	11.8%
All Trucks	43.2%
Growth Rate	2.0% (Annual)

As **TABLE 1** shows, the ADT volumes on this section of US 2 are expected to continue to increase. Traffic volumes on the route are expected to grow at a rate of about 2 percent per year over the foreseeable future.

D. Summary of Purpose and Need

The primary purposes and needs and other benefits of the proposed project are to:

- ☐ Replace a deteriorating bridge with a new structure built to meet current design standards and serve the traveling public for an approximate design life of 75 years.
- ☐ Provide a structure more resistant to earthquakes as appropriate for the bridge's location in an area with a significant risk of a serious earthquake. The construction of a new, more earthquake resistant bridge would make it less likely that an earthquake disrupts traffic on this important NHS route.
- ☐ Increase the width of the bridge deck and its approaches to meet MDT's design standard for roadway width. The existing bridge accommodates only a 9.1± m (30-foot) wide roadway. According to the NHS Route Segment Plan (for Primary

Routes) in MDT's "Geometric Design Standards," the minimum paved surface width for this route should be 12.0± m (40 feet).

- ❑ Improve the overall traffic safety at the river crossing by modifying the alignment across the structure and on its approaches, providing a wider surface on the road and bridge deck, and moving the approach and access road to the dispersed recreation site along the Middle Fork of the Flathead River. These improvements should reduce the number and frequency of accidents at this river crossing.
- ❑ Reduce the extent of supporting structure within the river channel. The existing bridge had five spans and four piers within the river whereas the proposed structure would have four spans and only three piers in the channel.
- ❑ Provide improved facilities for pedestrians and bicyclists at the crossing. The new bridge would have a 12.0± m (40-foot) wide roadway with two 3.6± m (12-foot) wide traffic lanes and two 2.4± m (8-foot) wide shoulders. Wider shoulders along both sides of the roadway would offer pedestrians and bicyclists a much-improved facility over the walkway on one side of the bridge and the narrow 0.9± m (3-foot) wide shoulders along the roadway.

III. Alternatives Considered

III. ALTERNATIVES CONSIDERED

A. Introduction

Montana highway and bridge projects are developed to meet or exceed the minimum geometric standards for bridges and highways. These recommended standards are based on policies and design guidelines established by the AASHTO.

This Part of the Environmental Assessment discusses the range of alternatives initially considered for this project, identifies a Preferred Alternative, and discloses the reasons one alternative is preferred to the others.

B. Alternatives Considered

Both the *NATIONAL ENVIRONMENTAL POLICY ACT (NEPA)*, as amended, and the *MONTANA ENVIRONMENTAL POLICY ACT (MEPA)* require an evaluation of reasonable alternatives for the proposed project, including the alternative of taking no action. Reasonable alternatives are those that are realistic, technologically available, and that represent a course of action that bears a logical relationship to the proposal being evaluated.

Therefore, several alternative actions for this proposed project were considered including: 1) doing nothing; 2) rehabilitating the existing bridge; and 3) building a new bridge somewhere near the present river crossing. These alternatives are discussed in more detail in the following sections.

1. The No Build Alternative

The No Build alternative involves taking no action to improve or correct the deficiencies associated with the Middle Fork of the Flathead River bridge near Essex. This alternative would not modify the bridge's supporting structure or alter the alignment of its approaches. However, the existing bridge and its approaches would continue to receive minor maintenance needed to preserve the facilities for public use.

The costs associated with this alternative would be for maintenance work only and few, if any, new impacts would occur to the surrounding environment. Adjacent lands in the Flathead National Forest and Glacier National Park would not be affected since no new right-of-way or changes in access to these public lands would be needed. The visual appearance of the project area would remain unchanged.

2. Bridge Rehabilitation

Rehabilitation of the existing bridge would salvage usable parts from the structure while installing new members and pieces where needed. During rehabilitation work, the original structure is left standing in place while undergoing repairs. Rehabilitating old bridges,

particularly historic bridges, is a fairly common practice in the U.S. However, the existing Middle Fork bridge has no historical significance and is not an example of a unique structural design or notable engineering effort.

The environmental impacts of rehabilitating the existing bridge would be less than those associated with building a new structure since the length, alignment, and structural system of the main spans of the bridge would remain unchanged. Cofferdams would have to be constructed in the river around existing piers so footings could be exposed and modified to increase their survivability during an earthquake. Rehabilitating the bridge would not require any substantial changes to its approaches. Structural modifications would be made but the width of the bridge deck and the overall appearance of the existing bridge would remain unchanged. The dispersed recreation site adjacent to the Middle Fork would likely be used as a staging area for bridge rehabilitation work.

3. Build Alternatives

Three alternatives that would construct a new bridge within the project area were considered. These alternatives included building a new bridge at the site of the existing crossing and providing a new bridge at either upstream or downstream locations. For convenience, these "build" alternatives have been identified as:

Alternative A - Replace the Bridge on the Existing Alignment

Alternative B - Construct a New Bridge Downstream

Alternative C - Construct a New Bridge Upstream

Each alternative would construct a new bridge with a deck capable of accommodating a road $12.0 \pm$ m ($40.0 \pm$ feet) wide with two-way traffic. The approaches to the new bridge would transition from a width of $12.0 \pm$ m ($40.0 \pm$ feet) at the bridge ends to match the existing $10.4 \pm$ m ($34.0 \pm$ feet) wide road on each side of the river crossing. The new bridge would have a design life of more than 75 years but MDT would expect its actual service life to extend considerably longer. The structure would require little maintenance over the foreseeable future. The new bridge and its approaches would conform with MDT's "Bridge Design Standards" and current AASHTO Standard Specifications. As with the rehabilitation alternative, the dispersed recreation site adjacent to the river would likely be used as a staging area during construction of the new bridge.

More complete descriptions of the build alternatives are presented below.

a) Alternative A - Replace the Bridge on the Existing Alignment

Alternative A would provide a new structure at the same location as the existing Middle Fork bridge. The elevation and horizontal alignment of the new bridge would be similar to that of the existing structure. No major changes in the horizontal alignment of the bridge's approaches would be needed. This alternative would require that US 2 be closed or that an alternate river crossing in the project area be provided during construction of the new bridge. The environmental impacts of Alternative A would generally be confined to the existing roadway

corridor and the area of any detour or temporary crossing. This alternative would require little or no additional right-of-way. Short-term environmental impacts would occur from the construction and use of an alternate river crossing near the bridge site.

b) Alternative B - Construct a New Bridge Downstream

Due to steep terrain and surrounding land uses, locations for a new river crossing downstream from the existing bridge are severely limited. Although no specific downstream alignment was identified by MDT, this alternative can be described in a general manner. Constructing a new bridge downstream from the existing structure would require that US 2 be built east of the Walton Ranger Station to avoid impacts to the historic district. Substantial amounts of new right-of-way would be needed and previously undisturbed lands in Glacier National Park would be impacted. Additional horizontal curves would have to be introduced into the alignment of US 2 to construct this alternative. The existing bridge and its approaches would continue to be used during construction, minimizing disruptions to traffic on US 2. Following construction, the existing bridge would be removed and abandoned areas of approaches would be revegetated.

c) Alternative C - Construct a New Bridge Upstream

Terrain and land uses limit viable sites for an upstream crossing of the Middle Fork to locations near the existing bridge. MDT's bridge engineers and road designers identified a potential alignment for a new crossing just upstream (southeasterly) of the existing bridge. The centerline of the proposed alignment would be about $30 \pm$ m ($100 \pm$ feet) or less upstream from the centerline of the existing bridge. The alignment would provide a nearly tangent (straight) bridge and would require the reconstruction of a total of $400 \pm$ m (about $1,300 \pm$ feet) of US 2 on the approaches to the new bridge. Traffic would be maintained on the existing bridge and its approaches during the construction of the new bridge. After construction, the existing bridge would be removed and disturbed areas would be replanted.

C. Alternatives Eliminated from Consideration

The alternatives identified in this section were considered but not advanced. The reasons that the alternatives were eliminated from consideration are also clearly identified. The primary factors used to determine if an alternative should no longer be considered were:

- ☐ Does the alternative meet the Purpose and Need specified in Part II of the Environmental Assessment?
- ☐ Does the alternative result in adverse environmental impacts?
- ☐ How acceptable is the alternative to the public and involved agencies?

1. No Build Alternative

The No Build alternative is not a viable alternative because it does not meet the purpose and need of the proposed action. The No Build alternative would not address the fundamental deficiencies that exist with the present bridge's deck or supporting structure and would not remedy traffic

safety concerns on US 2 in the project area. This alternative also risks the sudden closure of the road in the event of a serious earthquake.

2. Bridge Rehabilitation

Previous work by MDT's bridge engineers determined that rehabilitating the existing bridge is not an effective action or a wise expenditure of limited public funds. Rehabilitation of the existing bridge does not meet the purpose and need for the project and was eliminated from further consideration because:

- Analyses by MDT's bridge engineers have shown that an investment of about \$1.4 million or more would be required to make the bridge meet current design standards for earthquake resistance.
- The type of supporting members and connecting joints used in the existing bridge are of an undesirable design and could be subject to failures under certain loading conditions.
- Revisions to existing pier foundations would require extensive work in the river and the pier at the north end of the bridge would need expensive changes. The environmental effects to the river from rehabilitating the existing structure would be similar, or possibly even greater, than those associated with the construction of a new bridge.
- Rehabilitating the Middle Fork bridge would not alleviate geometric conditions on the bridge and its approaches that likely have contributed to this location's higher than normal accident rate over the 1993-1995 period.

3. Alternative A - Replace the Bridge on the Existing Alignment

Reconstructing the bridge on the existing alignment was eliminated from consideration for several reasons. First, this alternative would not improve the horizontal alignment of US 2 in the vicinity of the bridge. The horizontal alignment and superelevation on the existing structure likely contribute to the higher than expected occurrence of accidents at this location. The accident potential at the bridge is heightened during the winter when roads are icy or snowy.

Additionally, building a new bridge on the existing alignment would require the temporary closure of US 2 or the use of an alternate river crossing in the vicinity of the present bridge to maintain traffic on the route. Closing the road for the time needed to reconstruct the bridge on its present location is unacceptable due to the heavy use of US 2 by recreational traffic and the importance of the route to intrastate and interstate travel and commerce. Finally, providing a detour and alternate crossing would add considerably to the cost of the project and could not be done without notable environmental impacts to the river and adjacent public lands.

Optimistically, building a new bridge on the same alignment would likely require at least two seasons to complete. If no detour bridge were provided in the area, the road would be closed for the time required to construct the new bridge and rebuild the approaches. Motorists would be

required to travel via detours on other east-west routes in Montana or in Canada for the duration of the road closure. The shortest such detour is about 490 km (310 miles). The Going-to-the-Sun Road does not present a viable detour route due to its seasonal closures and restrictions on the size of vehicles traveling over Logan Pass.

Motorists and passengers in some 1,400 vehicles per day would incur extra costs for fuel due to the additional distance of the detour route and they would be required to spend an additional 4.75 hours traveling around this crossing. Collectively, motorists following the shortest detour would travel nearly 698,300 additional kilometers (434,000 additional miles) and spend about 6,650 hours more to travel on the detour for each day US 2 were closed. Without assigning costs to either the additional hours of travel time for each motorist or for the added fuel consumed while using the detour, it can be easily inferred that the economic costs of a road closure are extraordinary.

The cost of such a road closure would be lessened if a detour bridge were provided at a location near the existing crossing. The most obvious location for a detour would be through the dispersed recreation site on the Flathead National Forest and across the same Glacier National Park land affected by MDT's proposal. However, providing a detour bridge here presents the same challenges and would result in many environmental impacts similar to those associated with building the currently proposed bridge. These impacts would include water quality concerns, threatened/endangered species impacts, vegetation loss, impacts on Wild & Scenic River corridor, impacts to Glacier National Park lands, loss of use of dispersed recreation site, temporary noise impacts. Such impacts would generally exist throughout the construction period for the new bridge.

If the road were closed for an extended period (particularly during the summer when tourists were present), traffic volumes on the route would decrease because motorists could not pass through the area. A reduction in traffic would translate into fewer visitors and likely result in less spending for goods and services in tourism-dependent communities along US 2 east and west of Essex. The significance of such adverse economic effects would obviously depend on the length of time the road is closed. If the road were closed for two years because of the bridge, the lost revenues from tourist spending on food, fuel, and lodging may very well be very significant to local communities.

For these reasons, replacing the bridge on the present alignment is not a viable alternative.

4. Alternative B - Construct a New Bridge Downstream

Building a new bridge downstream was eliminated from consideration due to the need to cross difficult and steep terrain and the potential impacts on lands and historic features in Glacier National Park and previously undisturbed lands in Flathead National Forest. Providing a bridge downstream of the existing crossing would introduce additional and undesirable curves in the alignment of US 2 and would likely require that grades steeper than those of the existing highway be constructed on the approaches to the new bridge.

The steep terrain downstream of the present bridge makes finding another river crossing site difficult. The terrain in the immediate vicinity of the existing crossing has historically been the "easiest" place to cross the Middle Fork. This is verified by the fact that two bridges (including the present structure) have been built in the same general location. Moving the bridge to another downstream location would increase the amount of approach work necessary on adjoining sections of US 2.

Further, this alternative would require substantial amounts of new right-of-way and ground disturbance within Glacier National Park. US 2 would have to be relocated to the east of the Walton Ranger Station Historic District requiring considerable clearing and excavation from the mountainside directly behind the ranger station. Since the highway and access to the ranger station has traditionally been from the west, changing the location of the highway access could adversely affect important characteristics of the historic site. Likewise, visual impacts associated with clearing and excavation for the new road would cause adverse impacts to the historic site and surrounding lands in the park.

Section 4(f) of the U.S. DEPARTMENT OF TRANSPORTATION ACT requires that properties like the Walton Ranger Station Historic District and Glacier National Park be avoided unless there are no feasible and prudent alternatives to using the property. In this instance, other alternatives that avoid or result in fewer impacts on these *Section 4(f)* properties exist and are being considered for this proposed action.

For the above-mentioned reasons, Alternative B was not advanced as a viable alternative.

D. Viable Alternatives

Only one alternative (**Alternative C - Construct a New Bridge at an Upstream Location**) was determined to be a viable action for this proposed project. As indicated earlier, Alternative C would involve building a new bridge immediately upstream from the existing structure. The new bridge and its approaches would be constructed on a nearly tangent northeast-southwest alignment. The No Build Alternative will be analyzed in Part IV of the Environmental Assessment for the purposes of providing a contrast or comparison with Alternative C.

E. Preferred Alternative

1. Reasons for Selection

Building a new bridge immediately upstream from the existing structure (Alternative C) has been selected as the Preferred Alternative for the proposed action. This alternative was preferred to the others because:

- ☐ rehabilitating the existing bridge would not be an effective action or a wise expenditure of limited public funds and would not meet the purpose and need for this project;

- ☐ Alternative A would require the unacceptable closure of U.S. Highway 2 or the use of a detour and temporary river crossing at another nearby site which could not be accomplished without notable adverse environmental effects;
- ☐ the proposed alignment for the new bridge and roadway will be consistent with MDT's geometric standards for design speed and for road and bridge deck width;
- ☐ the impacts to the Walton Ranger Station and other lands in Glacier National Park are less with this alternative than those associated with Alternatives A or B;
- ☐ the proposed alignment reduces or eliminates curves on the bridge's approaches and improves sight distance at the crossing; and
- ☐ the existing bridge and road can remain in service during construction resulting in substantial savings for traffic control and detour costs.

Alternative C was preferred because the No Build alternative does not satisfy the specified purpose and need for improvements to bridge. MDT believes that identified problems with the existing bridge are sufficient enough to warrant correction. Doing nothing to address deficiencies at the Middle Fork bridge is not prudent.

Conditions relating to the No Build Alternative provide the basis for establishing the Purpose and Need for this proposed action. Part II of this document indicates the No Build Alternative does not meet the traveling public's needs in terms of traffic safety considerations and adherence to MDT's current design standards for bridges.

2. Description of the Preferred Alternative

The following sections provide a description of the activities and features associated with MDT's Preferred Alternative.

Obtain New Right-of-Way

Construction of the Preferred Alternative would require a total of about 2.45 hectares (ha) or (6.05 acres) of new right-of-way for US 2. This total includes about 1.20 ha (2.97 acres) of right-of-way within the Flathead National Forest and about 1.24 ha (3.07 acres) of right-of-way within Glacier National Park.

The USFS must prepare a Letter of Consent before an easement across forest lands can be granted. The FHWA must request the NPS to provide land for highway purposes. After reviewing and evaluating the FHWA's request and required environmental compliance documents, the NPS would issue a Letter of Consent outlining the terms and conditions of the required transfer of park land. Ultimately, a Highway Easement Deed would be drafted and legally recorded, if acceptable to the NPS, FHWA, and MDT.

Proposed Bridge

The proposed project would replace the existing 9.1-meter-wide (30.0-foot-wide) five-span structure with a new four-span bridge capable of meeting current geometric design and earthquake design standards. The proposed new bridge would have an overall length of 190± m (about 623 feet) and a deck width of 12.0± m (40± feet). The bridge's deck would be made of concrete and would accommodate two 3.6± m (12.0±-foot) wide travel lanes and two 2.4± m (8.0±-foot) wide shoulders. T-101 bridge rail would be used over the length of the bridge. The guardrail used on the bridge and along its approaches would not be galvanized so the steel weathers to a rusty appearance.

The new four-span bridge would likely be supported by steel girders set on end bents and three piers in the channel. MDT intends to use drilled shafts for the three intermediate piers and for the end bents. The proposed bridge would have two 43.0± m (141.0± foot) long end spans and two, 52.0± m (170.6± foot) long intermediate spans. Except for the south end span which must accommodate a spiral transition off the structure, the new bridge would be on a tangent (straight) alignment. **FIGURES 2A** and **2B** show the proposed alignment for the Preferred Alternative. A preliminary layout plan for the new bridge is shown in **FIGURE 2C**.

Proposed Work on US 2 Near the Bridge

Since the proposed bridge would be constructed on a new location, sections of US 2 on either side of the crossing must be rebuilt to connect the new bridge with the existing highway. The approaches to the new bridge would transition from the 10.4± m-wide (34.0±-foot-wide) existing roadway on each side of the river crossing to match the new 12.0± m (40.0± feet) wide bridge deck. Road work would begin about 200± m (660 feet) north of the new bridge and end about 200± m south of the structure. The approaches would have a paved asphalt surface like the existing highway. To avoid further excavation of an existing steep and somewhat unstable cut slope northwest of the bridge, curb and gutter would be included along the west side of the new north approach.

Additionally, a new approach on US 2 and short segment of road would be built to continue access to the dispersed recreation site on USFS land upstream from the proposed bridge. The proposed action would also modify the existing approach to the Walton Ranger Station in Glacier National Park. Because the alignment of US 2 would be shifted towards the river in the vicinity of the Walton Ranger Station, the Preferred Alternative would require the existing US 2 approach at Walton to be modified. The existing road into the Walton area would have to be extended to meet the new alignment of US 2. The revised US 2 approach at Walton would be about 10 m (32 feet) wide and would have a paved surface.

Access Road to Dispersed Recreation Site

A new approach on US 2 and short segment of access road would be built to continue access to the dispersed recreation site on USFS land upstream from the proposed bridge. As **FIGURES 2A** and **2C** show, the proposed road to the recreation site would extend from the east side of US 2 and pass beneath the north end of the new bridge before joining the existing access road.

The proposed US 2 approach for the access road to the dispersed recreation site would be located

along the east side of the highway about $90 \pm$ m ($295 \pm$ feet) from the end of the new bridge. The proposed access road would be $5.0 \pm$ m ($16.0 \pm$ feet) wide and would extend approximately 182 m ($597 \pm$ feet) from US 2 down and along the river bank before joining the existing access road. The foundation for the access road would be created using rocks and other road fill material. Some of the rock and soils that exist along the bank where the access road would be built were placed there during past bridge projects or deposited during previous flood events. This material would be suitable for fill material and could be incorporated into the road's foundation. The access road would have a gravel surface. The maximum gradient on the new road would be 8 percent.

The proposed access road would be built only when the river is low enough so that the construction would not have any contact with the water. However, a portion of the access road and its foundation would be constructed below the ordinary high water mark elevation of 1139.2 m (3737.5 feet) for this location. The preliminary design for the access road shows that the road's surface would be at least 0.7 m (2.3 feet) above the elevation of ordinary high water mark elevation. The ordinary high water mark is important because it represents the landward regulatory limit for waters (in the absence of adjacent wetlands) for Section 404 permitting. The ordinary high water mark is the line on the banks of the river established by the fluctuations of water and indicated by physical characteristics such as: a clear natural line impressed on the bank; shelving; changes in the character of the soil; destruction of terrestrial vegetation; or the presence of litter and debris.

Riprap at the Bridge End Bents

Riprap must be placed beneath each end of the proposed bridge to protect the supporting structure during high water events. At the north (Essex) end of the proposed bridge, riprap bank protection would extend for about 9.1 m (30 feet) down the slope between the end bent (abutment) and the new section of access road beneath the bridge. The riprap at the south end of the bridge would extend from the end bent about 18.2 m (60 feet) down the slope to the river and be placed over an area about 48.7 m (160 feet) wide beneath the bridge. A geotextile would be placed beneath the riprap as an erosion control measure.

Little, if any, of the proposed riprap at each end of the bridge would be in the water under "normal" flow conditions in the Middle Fork. However, an estimated 76.2 linear meters (250 linear feet) of riprap would lie below the ordinary high water mark elevation at this crossing. This total represents combined linear measurements for riprap below the ordinary high water mark beneath the north and south ends of the proposed bridge. **FIGURE 2C** shows the area of riprap at each end bent in relation to the typical location of the edge of the river.

Proposed Gabion Retaining Wall

A near-vertical retaining wall made of gabions (rectangular, wire mesh baskets filled with rock) would be constructed between the new access road to dispersed recreation site and the fill slope at the north end of the new bridge. The proposed gabion wall would be built along the "uphill" side of the new access road with its principal purposes being to stabilize the slope and minimize the access road's encroachment on the river. The gabion wall would not be built in the river but the lowest gabions in the wall would be below the ordinary high water mark.

The proposed gabion retaining wall would have a total length of 21.8 m (71.5 feet) and would have a maximum height of about 3.6 m (11.8 feet) at the rear of the retaining wall. Between 1.8 and 2.1 m (6 and 7 feet) of the gabion wall's height would be visible. The rock used in the gabion wall would be derived from local sources and its color would attempt to match outcrops and river rocks in the area. The location of the proposed gabion wall is highlighted on **FIGURES 2A and 2C**.

Existing Roadway Obliteration and Revegetation

The existing structure and supporting road fills within the Flathead National Forest and Glacier National Park no longer needed for US 2 would be obliterated and restored to a natural condition as part of this proposed project. Lands disturbed by the proposed bridge replacement project would be graded and revegetated with native plants and seeds. MDT has already contracted with the NPS to perform the necessary revegetation work and the NPS has already begun the collection of plant seeds needed for the project. MDT's Contractor would provide an NPS approved weed free soil and the NPS would perform the revegetation work on both Glacier National Park and USFS lands disturbed by the bridge replacement.

Construction Staging Area

During construction, the contractor needs to have a base from which construction activities can be staged and an area for storing heavy equipment, construction materials and other supplies. MDT proposes to use a dispersed recreation site along the west bank of the Middle Fork just upstream from the bridges as a staging area for construction. This site, located on Flathead National Forest land, would be closed to public use for the duration of the construction period. Provisions would be made to ensure that recreational floating through the area could continue during construction. Such provisions would include leaving a sufficiently wide opening in the contractor's work bridge and installing temporary warning signs upstream advising floaters of the approaching construction zone.

The NPS is currently considering a project to improve parking and trailhead facilities adjacent to the Walton Ranger Station. MDT and the NPS discussed the possibility of using the area where the parking facilities would be built as a staging area for MDT's contractor. However due to uncertainties about the timing and implementation of MDT's bridge project and the NPS's project, the use of land at Walton by MDT's contractor was dropped from consideration.

Work Bridge(s)

Building the new bridge and demolishing the old bridge would require the installation and use of a temporary bridge or trestle in the river between the two structures. The contractor may also elect to build short sections of a bridge from each bank if such an action would facilitate planned construction activities. Work bridges provide the contractor with a platform for operating the needed heavy equipment without being within the river's flow. Work bridges are typically built using driven timber piles to support an old railroad car chassis or steel beams covered with timber planking. Span lengths would likely vary from 14-29 m (45-95 feet) in length.

The geometry of the proposed river crossing leaves the contractor little choice but to put the work bridge(s) between the old and the new structures. MDT has designed sufficient distance between

the old and new bridges to allow this to occur. MDT's contractor for this project would be responsible for determining the type of work bridge(s) that may be used.

Demolition of the Old Bridge

After the new bridge is completed, the old bridge must be dismantled and removed. The supporting structure of the old bridge would be disassembled and removed. Piers would likely be removed with the use of explosives. Blasting of the bridge piers would be confined with the use of "blankets" to control and contain debris and to facilitate removal of the remaining material.

Removal of Pre-1964 Bridge Remnant

MDT would remove a remnant of the pre-1964 bridge from within the Middle Fork of the Flathead River if this can be accomplished without causing major impacts to NPS land or the water quality in the Middle Fork.

Appearance of the New Bridge

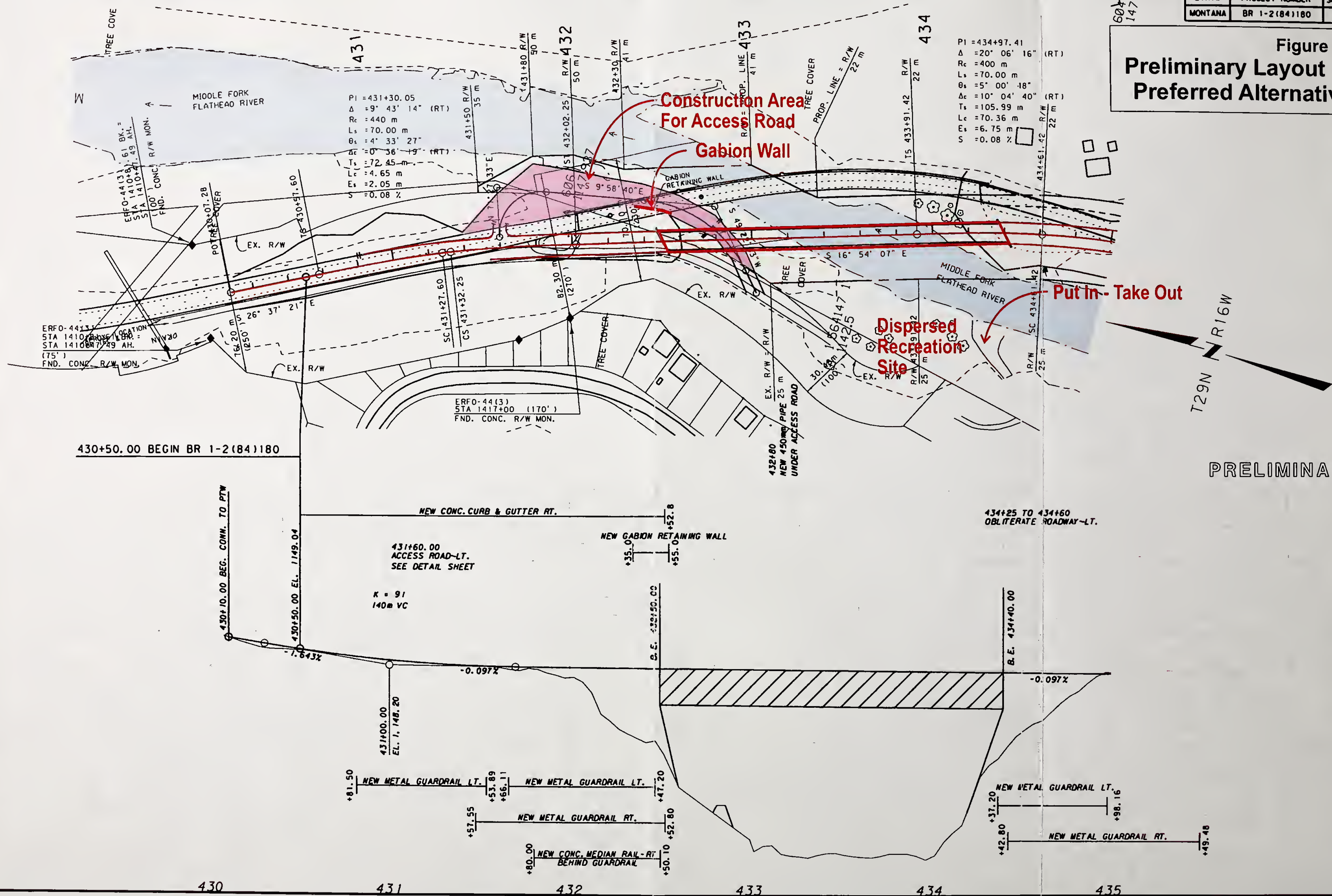
FIGURE 3 shows the existing Middle Fork of the Flathead River bridge near Essex and the probable appearance of the new bridge. Photo rendering techniques were used to illustrate the likely features and appearance of the proposed Middle Fork bridge.

Anticipated Schedule for Letting and Construction

MDT currently plans to let this proposed project to contract on May 24, 2001. Construction activities for the new bridge would begin shortly after the contract was awarded later in 2001. Construction of the new bridge and its approaches would likely occur over two construction seasons.

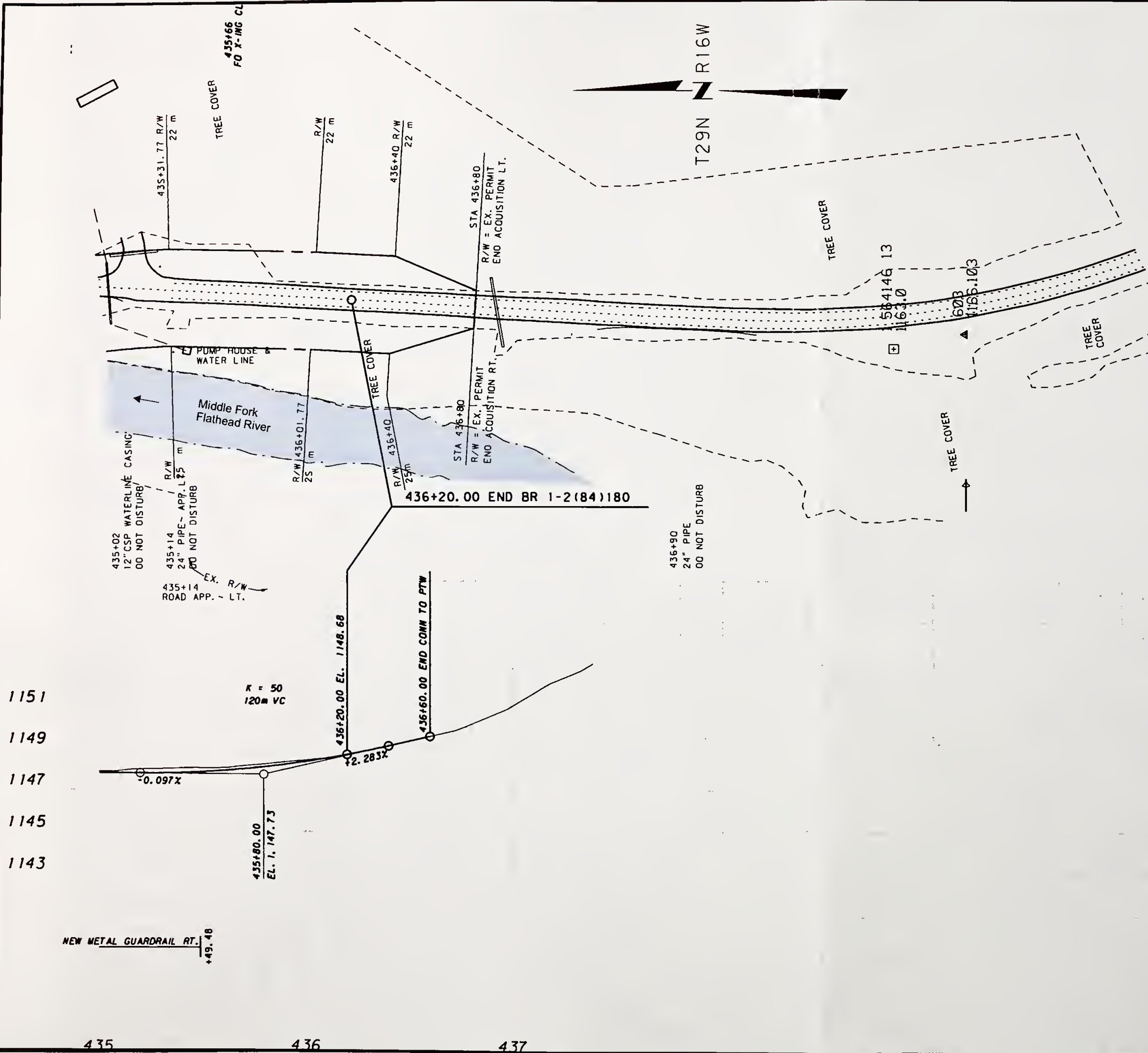
604
147

Figure 2a
Preliminary Layout of Preferred Alternative



PRELIMINARY

Figure 2b
Preliminary Layout of
Preferred Alternative



PRELIMINARY

1153
1151
1149
1147
1145

STATE	PROJECT NUMBER	SHEET NO.
MONTANA	BR 1-2(85)180	

NOTES

FINISHED GRADE: Finish grade of bridge centerline roadway equals the Profile Grade shown on Road Plans.

LIVE LOAD: Standard HS 20-44.

SPECIFICATIONS: Montana Department of Transportation and the Montana Transportation Commission Standard Specifications for Road and Bridge Construction, 1995 edition, and any amendments thereto, and the Special Provisions govern unless otherwise noted. Design was prepared in accordance with AASHTO Specifications, 1996 edition, and any amendments thereto.

STRUCTURAL STEEL: All structural steel is measured and paid for on the long run basis as set forth in the Standard Specifications. Use structural steel meeting the requirements of AASHTO M 183M. Estimated amount = XXX kg.

REINFORCING STEEL: Use new deformed type reinforcing steel meeting the requirements of ASTM Specification A 615/A 615M-86a Grade 60 (414 MPa) or better, associated with furnished and placing new reinforcing steel in the unit price bid for either Reinforcing Steel or Reinforcing Steel - Epoxy Coated.

CAST-IN-PLACE CONCRETE: Use Class "DD" for all substructure concrete and Class "Special Deck" for superstructure concrete unless otherwise approved.

CONCRETE STRENGTH: For structural design purposes only, "c" for Class "DD" concrete is 34 MPa (4900 psi) and "c" for Class "Special Deck" concrete is 34 MPa (4900 psi). For "Special Deck" mix design requirements see Special Provisions.

STRUCTURAL ANALYSIS: All structural analysis is to be conducted from beam analysis.

TRAFFIC CONTROL PLAN AND SEQUENCES FOR OPERATIONS: See Special Provisions.

UTILITIES: For location of utilities, see the appropriate Road Plans sheet.

EXISTING STRUCTURE: Remove the existing structure (see Road Plans sheets and Special Provisions).

UNITS: All dimensions shown on the General Layout are in meters. All other dimensions are in millimeters unless noted. Stations and elevations are expressed in meters.

STREAM DATA

Drift:	Severe
Scour:	Light
Ice:	Light
Drainage Area:	1346.8 sq. km
Base Flood Flow (D100 yr.):	961 m ³ /sec
* Base Flood Stage:	1141.00
Base Flood Velocity:	4.57 mps
Low Beam Elevation:	1145.472

Also see Hydraulic Data Summary sheet.
* Base Flood Stage elevation includes backwater

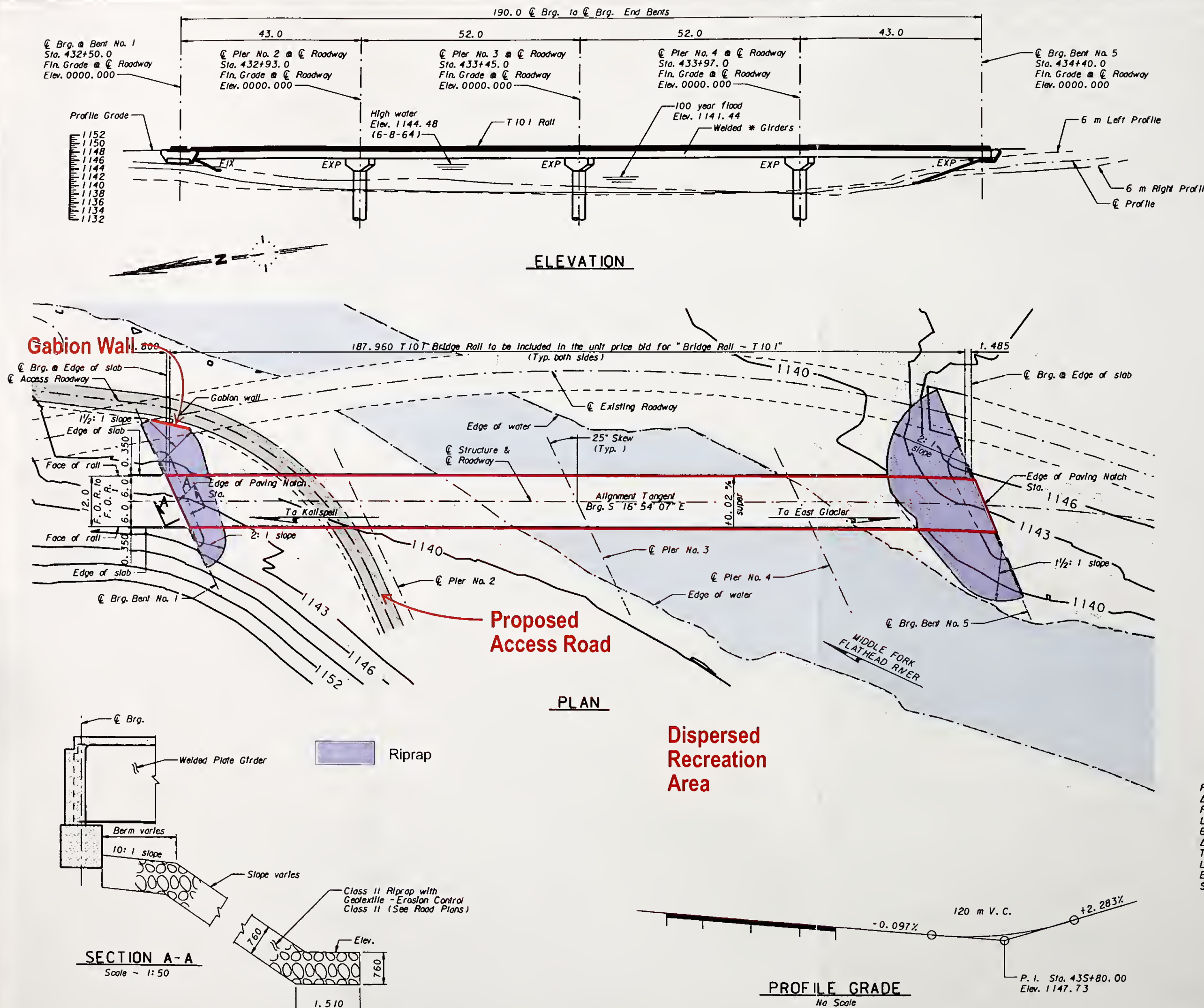
CURVE DATA

PI	= 434+97.41
Δ	= 20° 06' 16" Rt.
Rc	= 400 m
Ls	= 70.00 m
θs	= 5° 00' 48"
Δc	= 10° 04' 40"
Ts	= 105.99 m
Lc	= 70.36 m
Es	= 6.75 m
S	= 0.08%

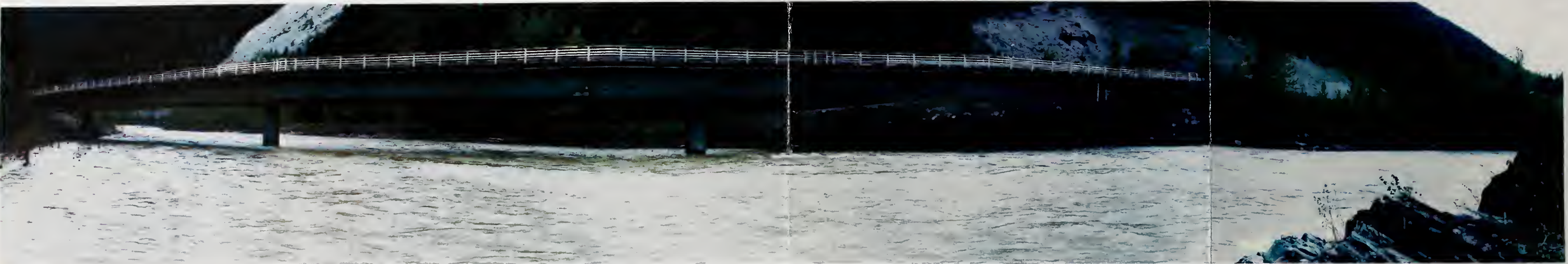
BRIDGE OVER MIDDLE FORK FLATHEAD RIVER
AT STA.
FEDERAL AID PROJECT NO. BR 1-2(85)180

Figure 2c
Preliminary Bridge Layout

DESIGNED	B-4-
DRAWN	B-7-
CHECKED	
APPROVED	
REVISION	
REVISION	

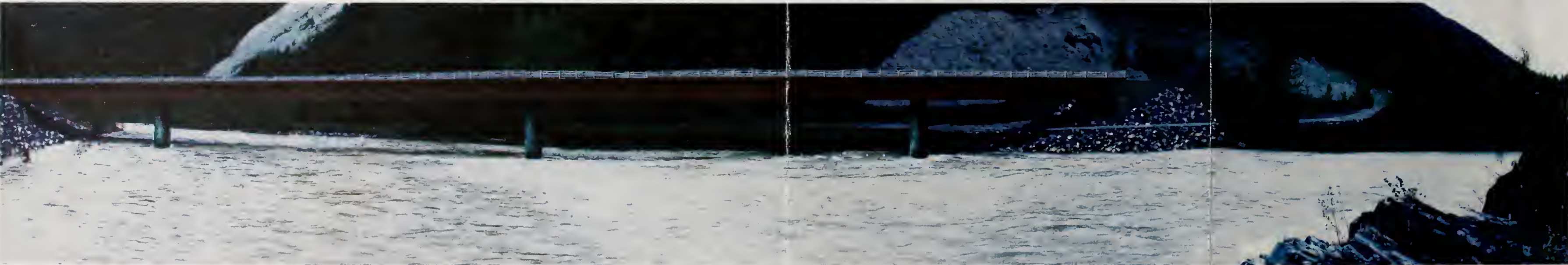


Existing Bridge



View of existing bridge, looking south from northeast shore of Middle Fork of Flathead River.

Proposed Bridge



Simulated view of proposed bridge, looking south from northeast shore of Middle Fork of Flathead River.

Figure 3
Photo Simulation #2

IV. Affected Environment and Environmental Impacts

IV. AFFECTED ENVIRONMENT and ENVIRONMENTAL IMPACTS

A. Introduction

A review of the social, economic, and environmental conditions and resources affected by the proposed bridge replacement on US 2 near Essex was completed for this Environmental Assessment. This review involved cooperation between MDT, federal and state agencies, officials from Flathead County, and the general public.

Contacts with federal and state agencies, local government, and the public also helped identify issues or concerns relevant to the proposed action. Major issues for this proposed bridge replacement project are highlighted below:

- Effects on the qualities and values of the Middle Fork of the Flathead Wild and Scenic River corridor, including visual impacts;
- Potential impacts on the Walton Ranger Station historic district in Glacier National Park;
- Impacts on recreational use of the Middle Fork and its banks;
- Effects on threatened/endangered and sensitive wildlife and fish species;
- Impacts of acquiring new or additional easements for the bridge and road from the Flathead National Forest and Glacier National Park; and
- Potential impacts on a neighborhood well house and other property in the nearby Parma Subdivision

These and other relevant issues are addressed in the following sections.

B. Environmental Impacts

This section discusses the potential impacts of implementing either MDT's Preferred Alternative or taking no action. As indicated in Part III, the No Build Alternative is being analyzed for the purposes of providing a contrast or comparison with the Preferred Alternative. A brief description of the existing environmental conditions in the project area is presented so any changes in these conditions caused by the implementation of these alternatives can be readily identified. The probable environmental effects of the No Build and Preferred Alternatives are described for each impact category. Only the impacts with a reasonable possibility for individual or cumulative impacts are assessed in this Part. Where appropriate, measures to mitigate the adverse environmental effects of the Preferred Alternative are discussed in each section.

1. Land Use Impacts

Existing Land Uses. Land in the project area is heavily forested mountainous terrain largely undisturbed by development. The major land uses in the area include the Walton Ranger Station in Glacier National Park, a dispersed recreation area on USFS land along the Middle Fork immediately upstream from the existing bridge, and the Parma Subdivision which adjoins the

community of Essex. Most residential dwellings in the Essex area are seasonally used and occupied primarily during the summer months. US 2 and the Burlington Northern Santa Fe Railroad follow the Middle Fork through the project area.

Land Use Plans and Controls. The use of lands and resources in the project area are generally guided by plans enacted by Flathead County, the USFS, and the NPS. These plans are briefly described below.

- The *Forest Plan* of the Flathead National Forest, adopted in 1985, provides general guidelines on the management of the Forest's resource base. Geographic Units are identified in the plan and used to describe the management direction for particular areas within the National Forest. The project area is located within the Middle Fork Geographic Unit of the Hungry Horse Ranger District. Forest lands adjoining this proposed project are classified as Management Area 18 according to the *Forest Plan*. The management emphasis for such lands is to provide optimum opportunity for public use and enjoyment of the Flathead Wild and Scenic River.
- The NPS finalized a new General Management Plan (GMP) for Glacier National Park during 1999. In addition to guiding the future development of the park, the GMP and its accompanying Environmental Impact Statement provides park managers with a framework for making decisions about resource protection and visitor use. The US 2 corridor in the project area is part of the Middle Fork Geographic Area identified in the GMP. The plan calls for the NPS to manage the US 2 corridor, the Walton Ranger Station and the nearby "Goat Lick" as a visitor service zone. The principal management goal for this zone is to provide information and interpretive services.

The NPS prepared a Transportation Plan for Glacier National Park in 1990. The plan was primarily concerned with the Going-to-the-Sun Road and other "in-park" roads with little mention of US 2 in the project area. However, the plan indicated that visitors would be encouraged to make loop trips through and around the eastern and southern portions of the park on the Going-to-the-Sun Road, U.S. Highway 89, Montana Highway 49, and US 2 as one means of reducing traffic on the Going-to-the-Sun Road during peak periods.

Glacier National Park's GMP and Transportation Plan identify US 2, including the portion of the route within the boundary of the park, as an important transportation route for visitors and staff. The GMP also suggests that traffic volumes on US 2 may temporarily increase during periods when the proposed reconstruction of the Going-to-the-Sun Road disrupts travel across the park.

- The project area also falls within the planning area for the *Flathead County Master Plan 2000* and *The Canyon Plan*, an amendment to the Master Plan adopted in 1994. *The Canyon Plan* is a "neighborhood" plan that provides general policy guidelines for the future use and development of privately-held lands in the "Canyon" communities (including Essex) along US 2 between Hungry Horse and Marias Pass. Uses of land are regulated by the Canyon Area Land Use Regulatory System that was adopted by Flathead

County in 1994. These regulations established a range of permitted uses and provide a set of performance standards and guidelines for development.

Impacts of the Preferred Alternative - This alternative would cause only minor, non-substantial impacts on existing land uses within the project corridor. The improvements associated with the Preferred Alternative would not change land uses or substantially alter the rate at which lands are developed due to the public ownership of most property adjacent to the project.

The Preferred Alternative would not conflict with the USFS's management area emphasis for affected lands which is to provide optimum opportunity for public use and enjoyment of the Flathead Wild and Scenic River. The proposed action would not inhibit public use and enjoyment of this reach of the Middle Fork of the Flathead Wild and Scenic River. However, public use of a dispersed recreation site on USFS land adjacent to the river would be temporarily lost during the construction period for the new bridge and its approaches.

Staff from Glacier National Park indicated that the proposed reconstruction of this bridge would not affect the provisions of the existing Master Plan, Transportation Plan, or the new General Management Plan.

According to the Flathead Regional Development Office, the Canyon Area Land Use Regulatory System does not require any land use review of this proposed bridge replacement.

Impacts of the No Build Alternative - The No Build Alternative would not impact any existing land uses in the corridor.

2. Right-of-Way, Utility, and Relocation Impacts

The total width of the existing right-of-way corridor for US 2 in the vicinity of the river crossing ranges from 52± m to 88± m (170± to 290± feet) wide on the west approach to the existing bridge and from 45± m to 61± m (150± to 200± feet) wide on the east approach. Lands needed for the existing highway and bridge through the Flathead National Forest were acquired through an easement from the USFS. The National Park Service-Glacier National Park issued a "Letter of Authorization" that authorized maintenance of the portion of US 2 that is within the boundary of Glacier National Park. The "Letter of Authorization" did not grant legal right-of-way or permanent interest in lands within Glacier National Park. The existing area authorized for US 2 in Glacier National Park includes the existing roadway prism (the constructed foundation for the highway) and a 3± m (10± foot) wide area to either side of the roadway prism.

The project area contains a number of existing utilities including a 0.2 m (8.0 inch) diameter, high-pressure natural gas line that crosses under the river upstream from the existing bridge and fiber-optic and high-capacity copper telephone lines that are attached to the bottom of the existing structure. A well and pump house maintained by the NPS and a flood early-warning system maintained by Flathead County are located between US 2 and the river opposite the Walton Ranger Station. A well house serving local residents exists with the Parma Subdivision.

Impacts of the Preferred Alternative - Construction of the Preferred Alternative would require

a total of 2.45 hectares (ha) or (6.05 acres) of new right-of-way. This total includes about 1.20 ha (2.97 acres) of right-of-way within the Flathead National Forest and about 1.24 ha (3.07 acres) of right-of-way within Glacier National Park. It should be noted that the right-of-way total for the Flathead National Forest includes 0.20 ha (0.49± acres) that were not acquired from the USFS during previous improvements on US 2 in the project area. Approximately 0.95 ha (2.36 acres) of land on the USFS side of the river and 0.52 ha (1.29 acres) on the NPS side would be within the construction limits for the proposed project. No construction permits would be needed within the Flathead National Forest or Glacier National Park.

FIGURES 4 and 5 show the areas within the Flathead National Forest and Glacier National Park that would be needed for highway purposes.

The area presently occupied by US 2 within Glacier National Park is not part of a formal easement or dedicated right-of-way. Instead, MDT has been authorized by the NPS to operate and maintain US 2 on about 0.85 ha (2.10 acres) of Glacier National Park land within the project area. Considering the area of this existing authorization and MDT's anticipated right-of-way needs, this proposed project would increase the total area devoted to US 2 within the Park by some 0.39 ha (0.97 acres). About 0.22 ha (0.54 acres) of the area now authorized for US 2 would no longer be required for this proposed project. This land would be graded, revegetated and restored to a natural condition by MDT as part of this proposed project.

Flathead National Forest lands required for right-of-way must be transferred to the State of Montana. The acquisition of right-of-way and subsequent use of Flathead National Forest lands for highway purposes would be accomplished in accordance with the provisions specified in the 1993 *Memorandum of Understanding on Procedures Related to State Highways Over National Forest System Lands* between MDT, FHWA, and the USFS as approved on January 27, 1993.

Once right-of-way plans for the proposed project are developed and approved, efforts can be initiated to secure easements or new rights-of-way for crossing lands in the Flathead National Forest, the Wild and Scenic River Corridor, and Glacier National Park. MDT's right-of-way plans will specify the amount of property needed from affected landowners in the project corridor.

The USFS must prepare a Letter of Consent before an easement across forest lands, including those located within the Wild and Scenic River Corridor, can be granted. Similarly, an easement must be granted by the NPS for crossing lands in Glacier National Park. These transfers of land must be completed prior to beginning construction on projects, like this proposed bridge replacement.

The State of Montana considers the Middle Fork of the Flathead to be commercially navigable between Nyack and the confluence of the North Fork of the Flathead. As such, the State claims ownership of the Middle Fork (between the low water marks on each bank) in this navigable reach. Therefore, under **70-16-201** and **70-1-202, M.C.A.**, the MONTANA DEPARTMENT OF NATURAL RESOURCES & CONSERVATION (DNR&C) has jurisdiction over the Middle Fork in this navigable reach. Since the project area lies upstream from Nyack, the Middle Fork in the project

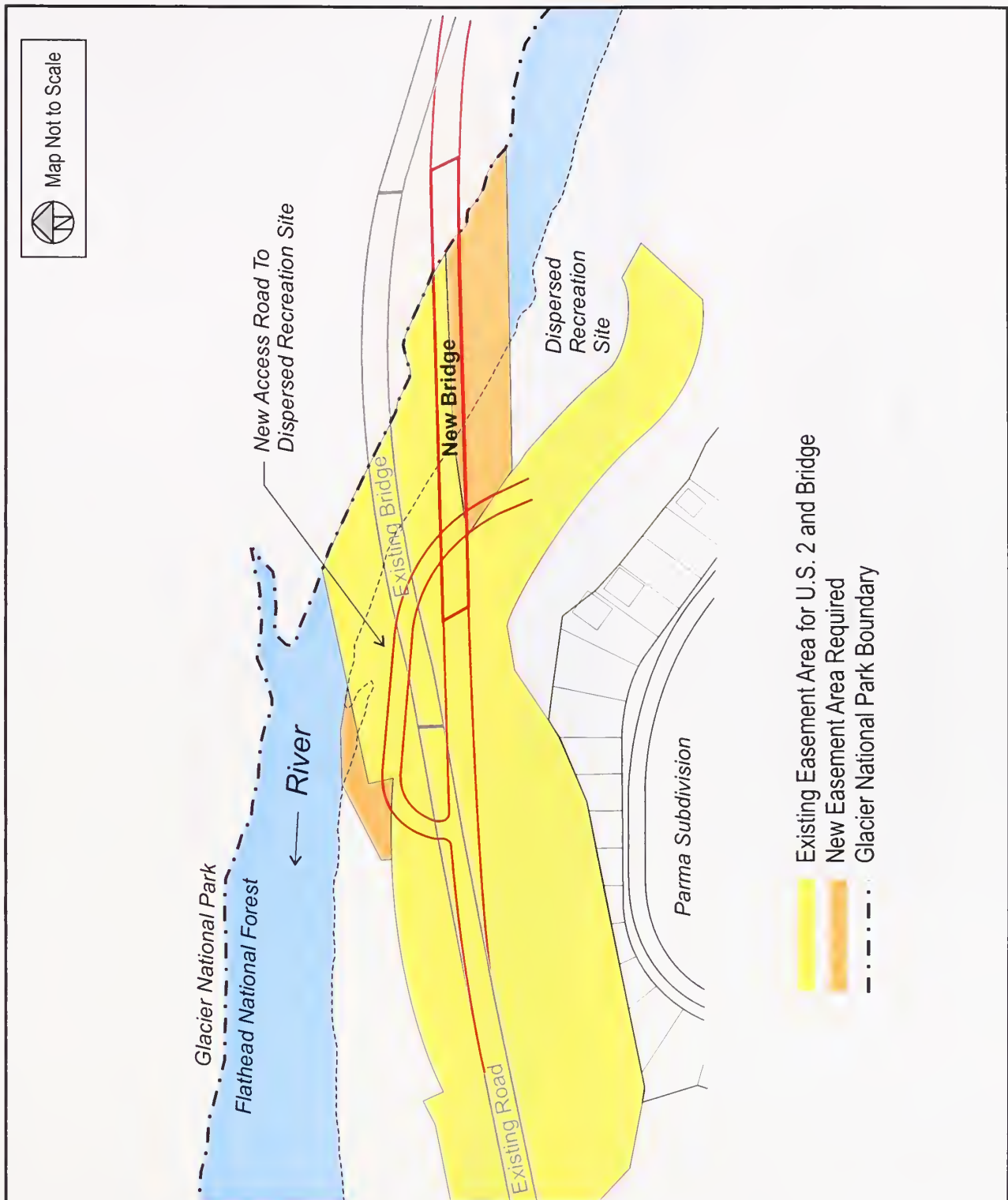


Figure 4
USFS Lands Needed
For Highway Purposes

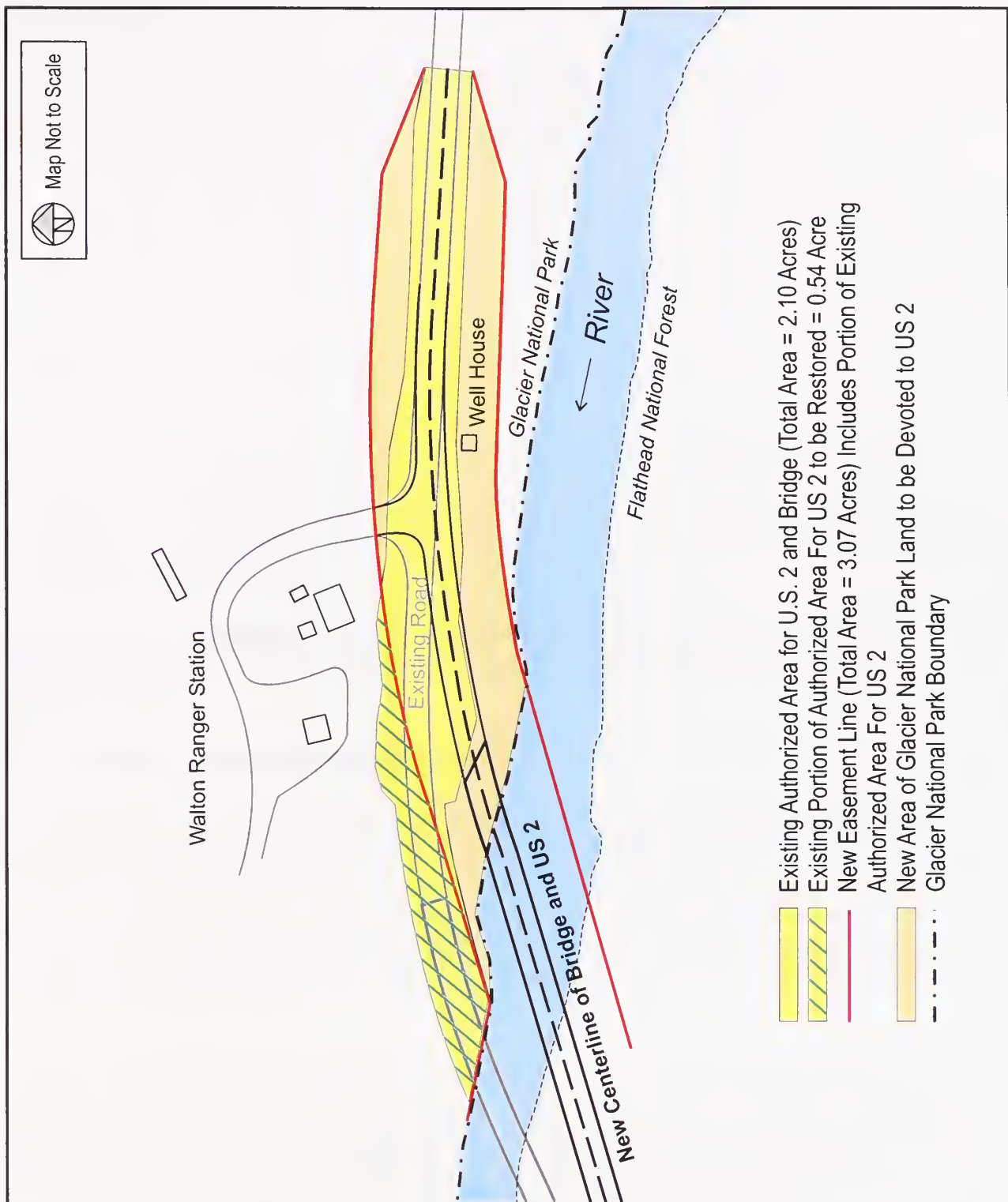


Figure 5
NPS Land Needed for
Highway Purposes

area is not considered navigable and there is no need to acquire permanent right-of-way or obtain a Land Use License from the State of Montana.

The Preferred Alternative would not affect the high-pressure natural gas line since the gas line crosses the Middle Fork upstream from the proposed bridge site. However, the fiber-optic and high-capacity copper telephone cables located along US 2 and on the existing bridge must be relocated. The NPS well and pump house and Flathead County's flood early-warning system located south of the existing bridge and west of US 2 would not be affected by the proposed action. Although unlikely, excavation for the new road may affect the water line from the NPS's well to the Walton Ranger Station which passes beneath the existing highway. If conflicts with the buried water line occur, necessary adjustments would be made during construction.

The Preferred Alternative would not relocate any residents of the Parma Subdivision or affect the community well house in the subdivision.

All lands needed for right-of-way from private ownerships on this proposed project would be acquired by MDT in accordance with both the *UNIFORM RELOCATION ASSISTANCE AND REAL PROPERTY ACT* of 1970 (P.L. 91-646), and the *UNIFORM RELOCATION ACT AMENDMENTS* of 1987 (P.L. 100-17). Compensation for right-of-way acquisitions is made at "fair market value: for the "highest and best use" of the land.

Impacts of the No Build Alternative - The No Build Alternative would not require any additional right-of-way, affect existing utilities, or result in the relocation of residents or businesses in the area.

3. Social Impacts/Environmental Justice

The proposed project is located within the U.S. Bureau of the Census' South Fork Census Division that generally encompasses the southeast quarter of Flathead County. The South Fork Census Division includes the communities of Hungry Horse, Martin City, Coram, and numerous small communities along US 2 to Marias Pass. Permanent residents of the Essex area are included in the census data for the South Fork Census Division. The census showed that the total population of this portion of Flathead County was about 1,960 in 1990 and its total population had changed little since 1980.

Although no recent estimate of population is available for this South Fork Census Division, it is reasonable to assume the area has experienced a slight increase in population given Flathead County's growth since 1990. Population estimates from the Montana Department of Commerce show the County's population increased by more than 20% between 1990 and 1996.

According to the U.S. Census, the residents of the South Fork Census Division possessed the following characteristics in 1990 as compared to statewide averages:

- Only 4% of the population were minorities as compared to a statewide average of 8%.

- About 10% of the residents were over the age of 65 as compared with an average of 13% for the State.
- The median household income was \$16,932 and per capita income was \$8,167 as compared to statewide averages of \$22,988 and \$11,213, respectively.
- Some 28.4% of the families had incomes below the poverty level as compared to a statewide average of 12.0%.
- The average household size was 2.66 persons as compared to a statewide average of 2.53 persons.

The Canyon Plan indicates there are about fifty dwellings in the Essex area. Of these, less than ten are used year-round. Due to the small number of permanent residents in Essex, the population characteristics presented above are more likely to be representative of the permanent residents of the larger communities along US 2 than the residents of the project area.

Impacts of the Preferred Alternative - Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority and Low-Income Populations*, signed by President Clinton in 1994 has been observed for this proposed project. This proposed action would not have any significant impact on the location, distribution, density or growth rate of the population of the Essex area. The proposed action would not adversely affect any social or ethnic groups and it would not isolate or divide existing residential areas. This proposed project would not cause a disproportionately high adverse human health or environmental effects on minority and low income populations. This proposed project also complies with the provisions of *TITLE VI* of the *CIVIL RIGHTS ACT* (**42 U.S.C. 2000d**, as amended) under the FHWA's regulations (23 CFR 200).

The Preferred Alternative would provide traffic safety benefits and a more efficient facility for local residents and other road users by increasing the width of the roadway and bridge and enhancing sight distance within the corridor. The wider road and bridge associated with the Preferred Alternative would improve safety for pedestrians and bicyclists on US 2. The proposed tangent alignment of the new bridge would also benefit traffic safety, particularly when roads are slippery due to ice or snow cover.

Impacts of the No Build Alternative - This alternative would not require the acquisition of land and would not displace households, businesses, or other areas used for human activities. Taking no action would not influence population growth or distribution in or near the project area.

4. Economic Impacts

The economy of the Essex area is highly seasonal and dependent upon the attraction of visitors to destinations like Glacier National Park, the Great Bear Wilderness, and other public lands in the region. Businesses in the project area have capitalized on the natural resources and beauty of the area and offer lodging, camping, dining, and outfitting services to visitors. According to *The Canyon Plan*, businesses in the Essex area are dependent on tourist activities between the late spring and early fall each year. The Izaak Walton Inn caters primarily to recreational visitors in the late fall and winter months. Few other local services are available in the Essex area during the winter. US 2 and AMTRAK passenger rail service provide the primary means for visitors to access the project area throughout the year.

Commercial rafting outfitters and recreational floaters often use the Middle Fork and a dispersed recreation and river access site near the existing bridge. May through September is the typical season for floating on this reach of river. Five outfitters are currently permitted by the USFS to operate float trips on the Middle Fork in the project area. The USFS estimates that between one and four float parties may be present on this section of the river each day during the floating season. Heavier recreational use occurs on some summer weekends. Early season floating on the Middle Fork typically originates upstream at the confluence of Bear Creek or put-in locations in the Great Bear and Bob Marshall Wildernesses. The dispersed recreation site near Essex is used as a put-in/take-out location by floaters, particularly after water levels upstream in the Middle Fork decrease during the summer.

Impacts of the Preferred Alternative - Right-of-way acquisition from private lands would result in minor loss in property tax revenue to Flathead County. However, no private land would be needed as new right-of-way for this proposed project. No notable economic impacts on businesses in the Essex area are expected since traffic would be maintained on US 2 during construction of the proposed bridge.

Some localized direct economic benefits from this proposed project may be experienced during its construction. Such benefits would be minor and likely consist only of worker expenditures for food and/or lodging in the general area. Contractor purchases of construction materials like concrete may also occur from suppliers in Flathead County. Completion of the project would result in long-term indirect economic benefits through the provision of a safer and more efficient route for the traveling public.

The proposed use of the dispersed recreation site near the existing bridge as a construction staging area would affect commercial rafting operations on this section of the Middle Fork. Since the site would be unavailable for recreational use during the construction period, outfitters would be unable to launch trips from the Essex put-in. Outfitters may have to originate trips from an alternate downstream put-in site like Paola Creek, located 11 km (seven river miles) from Essex.

Contacts with rafting outfitters indicate that some float trips presently offered may not be possible if the river access near Essex were unavailable for use. A reduction in the number of rafting trips offered would mean a loss of revenue to the rafting outfitters. Additionally, the charges to customers may have to be lowered to correspond with reductions in the lengths of float trips offered by outfitters.

Rafting outfitters contacted for this project suggested that an area at the Walton Ranger Station in Glacier National Park could be developed as a temporary location for river access during the construction period. MDT discussed this possibility with the NPS, but the agency did not support establishing a temporary river access at the Walton Ranger Station. The NPS cited congestion, the lack of parking space, and effects of increased recreational use of the area on existing facilities and activities as reasons for not establishing a temporary river access at Walton.

Impacts of the No Build Alternative - This alternative would not change economic conditions

or cause any new economic impacts to residents or businesses in the project area.

5. Floodplains

Executive Order 11988 and FHWA's floodplain regulations (23 CFR 650, Subpart A) requires the proposed action be evaluated to determine if any encroachment on the "base" floodplain is likely. The "base" floodplain is the area covered by water from the 100-year flood. The 100-year flood represents a flood with a 1% chance of being equaled or exceeded in any given year.

The existing highway crossing over the Middle Fork of the Flathead River near Essex is shown on the Flood Insurance Rate Map (FIRM) index as panel # 1575C. However, due to the low population and limited amount of improved property within this area, FIRM panel #1575C was never studied or created. For unmapped areas such as this, the Flathead County Floodplain and Floodway Management Regulation does not require a Floodplain Development Permit.

a) Flood History of the Middle Fork

Large floods on the Middle Fork of the Flathead River are typically the result of heavy rainfall combined with snowmelt, although in some areas rainfall or snowmelt alone can be the cause of flooding. Historic records of stream flow at gaging stations maintained by the U.S. Geological Survey show that widespread flooding occurred on the Middle Fork and most other streams in Flathead County during 1894, 1928, 1948, 1964, and 1975. Newspaper accounts and photographs indicate that the 1964 flood on the Flathead River system was probably far greater than a 100-year flood. The 1964 flood washed out the previous bridge over the Middle Fork near Essex and about 24 km (15 miles) of US 2 between Essex and Nyack. Flooding on the Middle Fork of the Flathead River during the spring of 1997 was less than the 100-year flood.

b) Floodplain Impacts

Impacts of the Preferred Alternative - Constructing a new bridge and roadway would involve a transverse encroachment on the floodplain of the Middle Fork of the Flathead River. However, the replacement of the structure on the Middle Fork would be designed in a manner that would not increase in water surface elevations over existing conditions for the 100-year flood event. MDT standard procedures and specifications would be employed to ensure that the required transverse encroachment meets FHWA guidelines.

MDT has established the elevation of the 100-year flood at the Middle Fork crossing to be about 1141.4 m (3,745.0 feet). Based on this elevation, portions of the proposed access road to the dispersed recreation site, the gabion retaining wall, and some riprap at each bridge end would be located below the estimated elevation of the 100-year flood. Survey data shows that much of the dispersed recreation site would also be inundated by floodwaters associated with a 100-year flood making it unavailable for recreational use during such high water events. The access road would not be overtopped by ordinary high water (2-year flood) flow conditions in the Middle Fork. The preliminary design for the access road shows that the road's surface would be at least 0.7 m (2.3 feet) above the elevation of ordinary high water mark elevation.

The proposed bridge would be designed in a manner that would not increase water surface elevations over existing conditions for the 100-year flood event. Since the proposed bridge would use drilled shaft piers instead of large conventional piers like the existing bridge and one less pier would be within the river channel, some minor hydraulic benefits could be realized during flood events. The construction of the proposed access road, gabions, and riprap placement at the bridge ends would not change the hydraulic geometry of the stream at this crossing.

The proposed project would not promote or encourage development within the base floodplain, nor increase flood liability hazards from its construction. Therefore, this proposed project is considered to be in compliance with Executive Order 11988, *Floodplain Management*, and meet floodplain management criteria.

Impacts of the No Build Alternative - This alternative would have no effect on floodplains in the project area. There are no risks of new flooding incurred, no impacts on natural and beneficial floodplain values, and no likelihood of incompatible floodplain development.

6. Water Resources and Quality

The Middle Fork, together with the North and South Forks of the Flathead, comprise the Flathead River system. The Middle Fork originates from headwaters streams in the Great Bear and Bob Marshall Wildernesses and flows northwesterly before joining the North Fork near West Glacier and the South Forks near Hungry Horse. Major tributaries of the Middle Fork in the project area are Essex Creek and Ole Creek.

In 1997, the State Legislature assigned MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY (MDEQ) the responsibility under *Section 401* of the federal *CLEAN WATER ACT* (**33 U.S.C. 1251 – 1376**) and the *MONTANA WATER QUALITY ACT* (**75-5-101 M.C.A., et seq.**) to monitor and assess the quality of Montana surface waters and to identify impaired or threatened stream segments and lakes. The MDEQ sets limits, known as Total Maximum Daily Loads (TMDLs), for each pollutant entering a body of water. TMDLs are established for waterbodies that fail to meet certain standards for water quality and describe the amount of each pollutant a waterbody can receive without violating water quality standards. The Middle Fork is not listed by the MDEQ as “water quality limited” and in need of TMDL development.

Although TMDL standards have not been established for the Middle Fork of the Flathead River, Flathead Lake does have a serious nutrient loading problem and is considered to be an impaired water body according to the MDEQ’s 303(d) list. The Flathead Basin Commission, MDEQ, the Montana Department of Natural Resources and Conservation, and the Confederated Salish and Kootenai Tribes are currently working to create an effective plan to reduce levels of nutrients entering the lake through upstream and shoreline sources. The principal goals of this plan are to achieve established TMDLs for pollutants and remove Flathead Lake from the list of impaired water bodies. TMDL standards developed for Flathead Lake depend on actions to reduce nutrient loadings within the Flathead River system, including the Middle Fork. Such actions include the reduction of runoff from construction activities on or near the river’s tributaries.

Surface water in the Middle Fork is of excellent quality since essentially pure rainwater and snowmelt from high elevation watersheds are channeled into progressively larger tributary streams. Surface waters of the river and its tributaries typically have moderate concentrations of dissolved materials and high concentrations of dissolved oxygen. Heavy metals and excessive salts are generally absent from surface waters of the Middle Fork. Low nutrient concentrations inhibit the growth of aquatic plants and keep the amount of biological matter relatively low. The erosion of large amounts of unconsolidated materials from stream banks during spring runoff adds large quantities of sediments to the Middle Fork and produces seasonal increases in turbidity. The Middle Fork and its tributaries run extremely clear during low flow periods.

Road sanding to help maintain a safe driving surface on the existing bridge and road during icy road conditions has affected the Middle Fork. Observations show that accumulations of road sand are present on the structure and on bank areas beneath the bridge. Some of the sand applied to the road and bridge each winter undoubtedly enters the river and adds minor amounts of sediment to the stream.

There are no EPA-designated sole-source aquifers or wellhead protection areas in the project area. However, the NPS's Walton Ranger Station and homes in the Parma Subdivision rely on wells for domestic water.

Impacts of the Preferred Alternative - Temporary degradation of surface waters would occur from this proposed project due to the need to excavate material from within the channel and place minor amounts of fill materials along and possibly in the Middle Fork. Limited excavation within the river bed of the Middle Fork would be necessary to construct three drilled shaft piers to support the new bridge. Drilled shafts are constructed by first driving large-diameter steel casings into the channel bottom and then auguring out material from inside the casing until the required depth beneath the channel bottom is obtained. Reinforcing steel is then placed and concrete poured to form the piers. The use of drilled shafts would contain the disturbance to the channel bottom and minimize the amount of sediments produced during pier construction.

Riprap and fill material (road fill, rocks, soil) would be placed along the banks of the Middle Fork and at other locations within the project area to construct the bridge, its new approaches, and an access road to the dispersed recreation site along the river. The construction of these project features would not change the hydraulic geometry of the stream at this crossing.

Riprap, placed at each end of the proposed bridge, would not be in the water under "normal" flow conditions in the Middle Fork. However, an estimated 76.2 linear meters (250 linear feet) of riprap would lie below the ordinary high water mark elevation at this crossing. This total represents combined linear measurements for riprap below the ordinary high water mark beneath the north and south ends of the proposed bridge. The lowest gabions in the proposed retaining wall near the north end of the new bridge would also be below the ordinary high water mark. The proposed access road would not be located in water, although a portion of the access road and its foundation of road fill would be constructed below the ordinary high water mark elevation. Some rock and soil that exist along the north bank could serve as suitable material for the proposed access road.

The proposed bridge and highway construction activities could adversely affect the quality of surface waters in the project area unless preventative measures are taken. Rock or soil particles could be transported to surface waters by runoff and deposited at downstream locations. This process occurs naturally to some extent, however, the erosion of areas disturbed by the construction could contribute additional sediments to surface waters. Increased sediment loads may alter downstream deposition patterns, cause water temperatures to increase, cause the turbidity of the water to rise, increase the level of nutrients (nitrates and phosphorus), decrease the quality of existing fisheries, and promote algal growth. This proposed project would not generate sediments at a level that would cause such adverse effects.

Highway designers would use MDT's "Highway Construction Standard Erosion Control Workplan" to identify Best Management Practices (BMPs) for control of erosion and sediment transport. The selection of BMPs would be based on the distance to surface water or wetlands, precipitation intensity, soil properties, slopes, and the presence of critical resources (like threatened or endangered species habitat, prime fisheries, etc.).

An Erosion Control Plan, incorporating appropriate BMPs, would be developed and approved prior to the construction of the proposed project. BMPs would be included in the design of this Plan using guidelines as established in MDT's "Highway Construction Standard Erosion Control Workplan." The Plan would be submitted to the MDEQ Permitting and Compliance Division in compliance with their Montana Pollutant Discharge Elimination System Regulations (ARM 16.20.1314) for this proposed project.

The main objective of the Erosion Control Plan would be to minimize the erosion of disturbed areas and prevent the transport of sediments to wetlands or surface waters during the construction and post-construction phases of the project. With the proper design, implementation, and follow up actions, the BMPs would minimize erosion and the potential for sediments to enter surface waters. Efforts to control erosion and runoff from the construction zone would be consistent with efforts by the Flathead Basin Commission and others to reduce nutrient loadings within the Flathead River system and help achieve TMDL standards in Flathead Lake.

The timing of work within the channel and other restrictions would be indicated as conditions of approval for the issuance of a *124SPA* Stream Protection Permit from the MONTANA DEPARTMENT OF FISH, WILDLIFE & PARKS (MDFWP). Likewise, the placement of any fill material in the Middle Fork would be subject to the issuance of a Section 404 permit by the U.S. ARMY CORPS OF ENGINEERS (COE). A 318 Authorization must also be obtained from the MDEQ for the minor, short-term increase in turbidity expected to occur in the Middle Fork during construction of the new bridge. These and other permit requirements are discussed at the end of this Part.

Groundwater hydrology in the project area would be unaffected by the proposed bridge replacement since excavation would not expose or affect the groundwater table.

Impacts of the No Build Alternative - The No Build Alternative would not cause any new effects on surface or ground water quality in the project area.

7. Wild and Scenic Rivers

In 1976, Congress designated 352 km (219 miles) of the North, Middle, and South Forks of the Flathead River as part of the National Wild and Scenic Rivers System. The purpose of this action was to maintain these waters for recreation, fish and wildlife habitat, and for scientific study. Portions of the river system are classified as Wild, Scenic, or Recreational based on their characteristics and use.

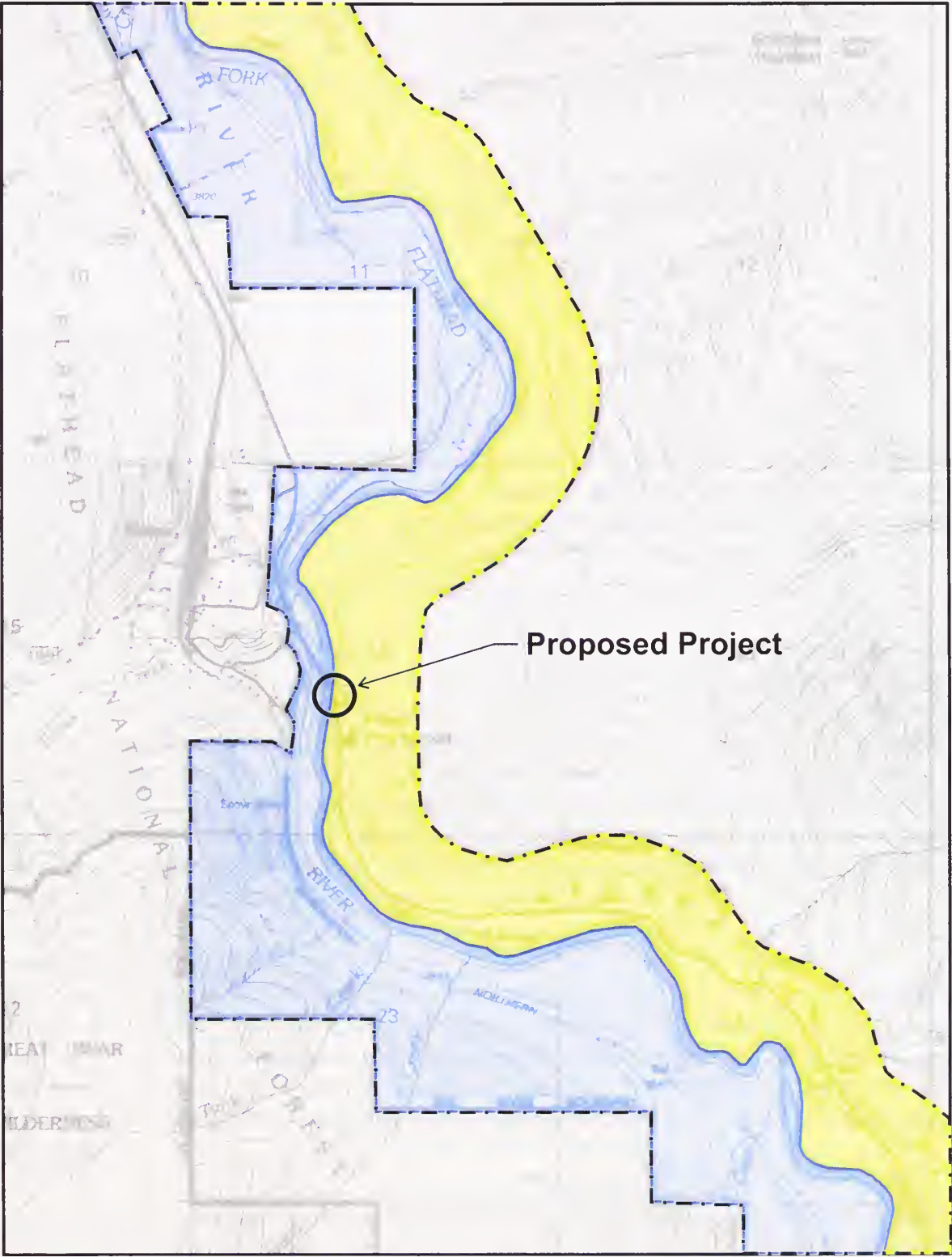
Each component of the Wild and Scenic River System was designated on certain Outstandingly Remarkable Values (ORV) recognized at the time of designation. The specific ORV's recognized for the Middle Fork of the Flathead River are: 1) free-flowing character; 2) accessibility and public use; 3) pleasing environment; 4) unpolluted waters; and 5) outstanding features such as scenery and wildlife.

Within the project area, the Middle Fork of the Flathead River is designated as a Recreational River. The USFS has also designated a Management Corridor (shown in **FIGURE 6**) for the Middle Fork Recreational River. Lands from both Flathead National Forest and Glacier National Park are included in the Management Corridor at this location. The USFS Flathead National Forest is the lead agency for the management of the Middle Fork of the Flathead Wild and Scenic River corridor.

Publicly-owned waters of designated Wild and Scenic Rivers are protected under *Section 4(f)* of the 1966 *DEPARTMENT OF TRANSPORTATION ACT (49 U.S.C. 303)*. Publicly-owned lands in the immediate proximity of such rivers may also be protected by *Section 4(f)* depending on how they are administered. Part V of this document considers the possible *Section 4(f)* impacts of the proposed action on the Middle Fork Recreational River and its Management Corridor.

Impacts of the Preferred Alternative - The proposed action would cross the Middle Fork of the Flathead Wild and Scenic River Corridor in the SW¼ of Section 14 in Township-29 North, Range-16-West, M.P.M. Within the Wild and Scenic River Corridor, approximately 1.09 ha (2.71 acres) of easement area from the Flathead National Forest and about 1.24 ha (3.07 acres) of easement area from Glacier National Park must be acquired for the proposed bridge construction project. This proposed project would increase the total area devoted to US 2 within the Park (and the Wild and Scenic River Corridor) by 0.39 ha (0.97 acres). Lands within the Wild and Scenic River Corridor on both sides of the Middle Fork would be disturbed to construct the proposed bridge and its approaches.

The Preferred Alternative would affect the Middle Fork of the Flathead Wild and Scenic River by constructing a bridge within the stream and on its banks. Specific activities to be undertaken include placing a temporary work bridge in the river; constructing piers for the new bridge in river; installing the substructure, superstructure, and deck for the new bridge; building abutments and new approaches to the bridge; building a short section of road to access the dispersed recreation area along the river; and removing the old bridge. The majority of the area adjacent to the river affected by these activities consists of lands disturbed by previous road and bridge construction and utility installations.






-  USFS Land Within Recreational River Management Corridor
-  Glacier National Park Land within Management Corridor
-  Recreational River Management Corridor Boundary

Figure 6
Middle Fork of the Flathead
Wild and Scenic River

MDT estimates that the proposed project would place a quantity of riprap equal to about 50% of the riprap currently in place at the crossing. The newly placed riprap may consist of some portion of the riprap currently at the crossing. Some of the rock and soil that exist along the bank where the access road would be built would be suitable for fill material and could be incorporated into the road's foundation.

Since five specific ORV's have been recognized for the Middle Fork of the Flathead Wild and Scenic River, the proposed action was reviewed to determine potential effects on these values. The proposed project's effects on the ORV's of the Middle Fork are discussed in the following paragraphs.

1) Free-flowing Character.

According to 36 CFR 297.3, free-flowing is defined as "existing or flowing in natural condition without impoundment, diversion, straightening, riprapping, or other modification of the waterway." The determination to include the Middle Fork of the Flathead River as an element of the National Wild and Scenic River System occurred in 1976, some 12 years after the existing bridge was constructed. At the time the Middle Fork was designated as a Wild and Scenic River, the present highway bridge was in place and riprap existed along the banks at this crossing. The area has also been the site of at least one other previous bridge and the banks of the river have undergone other natural and man-made modifications as a result of the 1964 flood.

The "free-flowing character" of this section of the Middle Fork would not be notably changed by the proposed project. In this instance, a bridge with riprap on the banks already exists at this crossing. At the conclusion of this proposed project, a single highway bridge with riprap at each of its ends would be in place. The only changes from the present condition would be a revised alignment for the bridge, a reduction of the number of piers in the river, and the presence of an access road beneath the bridge along the north bank of the river. Although some of the riprap and fill material would be placed along the banks of the Middle Fork below the ordinary high water mark elevation, there would be no impoundment, diversion, straightening or other modifications of the waterway.

2) Accessibility and Public Use.

The proposed project would not cause any long-term changes to the accessibility of the Middle Fork of the Flathead River or public recreational use of the river. The proposed shift in the alignment of US 2 would eliminate the existing approach and a portion of the road leading to the dispersed recreation site near the north end of the present bridge. MDT would provide a new approach at US 2 and build a connecting section of road to perpetuate access to the dispersed recreation site.

The construction of the new bridge would require two seasons and the dispersed recreation site on USFS land near the north end of the proposed bridge would be closed to public use during the construction period. During its closure, the dispersed recreation site would serve as a staging area for MDT's contractor. The proposed project would result in temporary impacts to recreational floating and river use at Essex but these conflicts with recreational use are unavoidable at this location. To help mitigate these adverse effects, floaters would be made aware of the proposed

bridge work at Essex and encouraged to use alternate put-in/take-out points up and downstream. Signs would also be posted at the Bear Creek put-in and upstream from the bridge site during the construction period advising river users of the obstruction to floating at Essex. Further, the contractor would be required to maintain a work bridge opening at least 9 m (30 feet) wide near the center of the channel to accommodate floaters.

The existing structure would be completely dismantled and removed at the completion of the work. MDT would also require the contractor to remove some remnants of the pre-1964 bridge near the south end of the existing structure. With the concurrence of the NPS and USFS, remnants of the pre-1964 bridge whose removal would damage the stream would be left in place. This activity would enhance recreation on the Middle Fork in the project area since a potential obstruction to floating would be removed.

3) Pleasing Environment.

The proposed bridge replacement would not substantially change the generally natural and riverine appearance of the Middle Fork at the road crossing nor would the project be inconsistent with the other classification criteria for Recreational River segments under the *WILD AND SCENIC RIVER ACT*.

As indicated previously, 0.22 ha (0.54 acres) of the area now authorized for US 2 would no longer be needed for the proposed project. This Glacier National Park land would be graded, revegetated and restored to a natural condition. Returning this land formerly occupied by the highway to a natural condition would benefit Park resources, including visitors and users of the Wild and Scenic River.

4) Unpolluted Waters.

As indicated in the previous discussions under 6. Water Resources and Quality, the proposed bridge and highway construction activities could cause short-term adverse effects on surface water quality. Rock or soil particles from disturbed areas could be transported to surface waters by runoff. With the implementation of appropriate erosion control measures, such adverse effects would be minimized or avoided. No long-term adverse effects on surface or groundwater quality would result from this proposed project.

5) Outstanding Features such as Scenery and Wildlife.

Like the present bridge and highway, the new facility would be visible from the Middle Fork Recreational River Corridor. Some vegetation adjacent to the existing highway and bridge at the crossing would be cleared for construction. Construction of the proposed access road to the dispersed recreation site would require a substantial amount of work along the west bank of the Middle Fork near the north end of the new bridge. The access road, a gabion retaining wall, and riprap bank protection would be apparent to floaters on the Middle Fork.

According to the *Environmental Assessment and Assessment of Effect for the Walton Area Plan* prepared by the NPS in December 2000, the general habitat type of the park lands that would be affected by the proposed alternative is spruce/queencup beadlily forest. The NPS Environmental Assessment notes that area along US 2 near the entrance to the Walton Ranger Station is

currently dominated by herbaceous, exotic species like timothy and spotted knapweed. Young cottonwood trees and some grasses dominate the riparian zone of the Middle Fork of the Flathead River in the vicinity of this project. The banks of the Middle Fork near the existing bridge are extremely rocky and do not support dense growths of vegetation. Mullein, and clover are common in previously disturbed areas associated with the dispersed recreation site and its access road. Few large trees exist on the bank area where the new south end of the bridge and highway approach would be constructed.

Virtually all trees and riparian vegetation would be removed in the area northeast of the new bridge to construct the US 2 approach and new segment of access road down the river bank to the dispersed recreation site on USFS land. This vegetation removal is necessary to accommodate the placement of fill for the new road and to place the gabion retaining wall. Additionally, trees and riparian vegetation would have to be cleared beneath north end of the new bridge. Few large trees exist on the bank area where the new south end of the bridge and highway approach would be constructed.

The proposed alignment for the new bridge and its approaches would likely require the removal of a few young cottonwoods and Douglas fir trees. Although these trees provide potential perching or roosting sites for resident and migrant bald eagles foraging along the river, their loss is not considered significant since similar habitat exists both up and downstream from the bridge site. MDT's Biological Resource Report documents for this proposed project indicate there are no known bald eagle nests or eagle roosts in the general project area. This statement is verified in the *Environmental Assessment and Assessment of Effect for the Walton Area Plan* prepared by the NPS in December 2000.

The vegetation affected by the proposed bridge replacement has limited value as habitat for wildlife. The primary species that would be affected would be small mammals and birds since vegetation that provides cover, nest sites, or other habitat for these species would be lost. Construction of the bridge and its approaches would temporarily displace such species to alternate nearby lands possessing the same habitats.

MDT performed a visual impact assessment for this proposed project (see **19. Visual Impacts** later in this Part). The assessment concluded that although some minor adverse effects to visual quality would occur at viewpoints within or along the river corridor, the overall visual quality of the area would not be greatly affected by the proposed bridge replacement. With the proposed revegetation of disturbed areas, the overall natural appearance and scenic characteristics of the river would not be substantially changed over its present condition by this proposed project.

Currently, the only structures visible from the river are the bridge and its supports, one or two residences in Essex situated on the edge of a steep bluff northwest of the bridge, and possibly some NPS buildings at Walton. The vegetation removal required by this proposed project would not change this condition for river users.

Conclusion

The proposed action would have no foreseeable long-term adverse effects on the free-flowing

nature, the setting, or the water quality of the Middle Fork Recreational River Corridor. The USFS Flathead National Forest coordinated with the NPS and prepared an analysis and determination of this proposed project's impacts during September 1999 in accordance with *Section 7 of the WILD AND SCENIC RIVERS ACT*. The analysis concluded that the proposed bridge replacement would not have any long-term significant effects on the free-flowing status or on the outstanding and remarkable values of the Middle Fork of the Flathead Wild and Scenic River. A copy of the agency's September 1999 analysis and relevant correspondence can be found in **APPENDIX B**. It should be noted that a new Section 7 Determination is being prepared by the USFS and should soon be available. MDT does not anticipate that the USFS would substantially change their overall conclusions about this project's effects on the Middle Fork of the Flathead Wild and Scenic River in the new Section 7 Determination.

Impacts of the No Build Alternative - The No Build Alternative would not impact the features, qualities, or public use of the Middle Fork Recreational River.

8. Erosion Control and Seeding

Construction of highway cuts and embankments, if left unattended, results in temporary erosion and siltation of the adjacent river. The replacement of the bridge, its piers, approach span pilings, new fills, riprap, gabions and the construction of new approaches to the bridge would cause temporary soil surface disturbances and short-term siltation into the Middle Fork. Temporary erosion control measures like silt fences, would be employed to minimize and control siltation.

MDT is obligated to reestablish a permanent desirable vegetation community along all areas disturbed by the proposed construction in accordance with **7-22-2152** and **60-2-208, M.C.A.** Typically, a set of revegetation guidelines would be developed by MDT that must be followed by the contractor. These specifications include instructions on seeding methods, dates, mix components, and the types and amounts of mulch and fertilizer. Seed mixes include a variety of species to assure that vegetative cover immediately stabilizes areas disturbed by construction.

For this proposed project, the MDT has contracted with the NPS to perform the necessary revegetation work. MDT's contractor would provide an NPS approved weed free soil and the NPS would perform the revegetation work with native plants and seeds on both Glacier National Park and USFS lands disturbed by the bridge replacement. The terms of this work arrangement are outlined in an Agreement between MDT and the NPS dated January 13, 1999 which can be found in **APPENDIX E**.

9. Wetlands and Other Waters of the U.S.

A wetlands survey for this proposed project was conducted by a biological resources consultant in June, 1997. Two sites within the area surveyed displayed characteristics of wetlands and were investigated in detail. Neither site was delineated as jurisdictional wetlands according to the 1987 COE delineation methods. However, both sites exhibit some functions and values associated with wetlands.

Site 1 is along the west bank of the Middle Fork below the ordinary high water mark. The $0.65 \pm$ ha (or $1.60 \pm$ acres) area begins north of the existing bridge and extends southerly along the river bank to the dispersed recreation site on USFS land. The site is subject to frequent inundation, especially during the spring and early summer, and is dominated by black cottonwood saplings, a species often found in wetlands. Hydric soils, characteristic of wetlands, are not present at this site. Although it is not a jurisdictional wetland, Site 1 is considered to be a "Water of the U.S." as defined in the *CLEAN WATER ACT*.

A second site with wetland characteristics exists south of the bridge between US 2 and the river. Wetland hydrology, as indicated by saturated and inundated soils, is present on most of the 0.002 ha (0.007 acre) site. However, vegetation within the site does not exhibit wetland parameters.

Impacts of the Preferred Alternative - No wetlands would be affected by the Preferred Alternative and no compensation for impacts is required. The proximity of Site 1, a "Water of the U.S.", to the existing bridge and construction staging area makes it susceptible to disturbance. An estimated $0.12 \pm$ ha ($0.29 \pm$ acres) of the site beneath the existing bridge would be permanently lost due to the construction of the new bridge and a new section of access road leading to the dispersed recreation site along the river. The remainder of the site could be temporarily disturbed as nearby lands would be used as a staging area for the construction of the new bridge. With special contract provisions addressing use of this area by the contractor, the implementation of an Erosion Control Plan, and conditions imposed in the *124SPA* Stream Protection and Section 404 *CLEAN WATER ACT* permits, the long-term effects of the temporary disturbance to this "Water of the U.S." should be minimized.

Impacts of the No Build Alternative - The No Build Alternative would not affect wetlands or "Waters of the U.S."

10. Biological Resources

A Biological Resources Report was prepared in November, 1993 for MDT's proposed bridge rehabilitation work at the Middle Fork crossing. This report evaluated the potential impacts to biological resources in the project area resulting from upgrading the existing bridge. Since the proposed scope of work has changed from bridge rehabilitation to total replacement, new coordination with wildlife management agencies was initiated, the Biological Resources Report was reviewed, and new information was gathered about biological resources in the project area. A memorandum supplementing the original Biological Resources Report was prepared by a biological resources consultant in September 1997. The memorandum discussed the potential impacts of building a bridge on a new alignment at the Middle Fork crossing. Supplemental work to examine the effects of the proposed bridge replacement on bull trout and habitat important to the species was done in October 1998. A supplemental Biological Assessment examining this proposed project's effects to Canada lynx and their habitat was completed in July 2000.

a) Threatened/Endangered Wildlife

The Biological Resources Report and subsequent update identifies Federally-listed

Threatened/Endangered (T/E) species that may occur in the project area near Essex. The identification of T/E species and evaluation of potential effects was conducted in accordance with Section 7 of the *ENDANGERED SPECIES ACT*, (16 U.S.C. 1531-1543) as amended. Based on coordination with the U.S. FISH AND WILDLIFE SERVICE (USFWS), the following T/E species may occur in the project area:

- Bald Eagle (*Haliaeetus leucocephalus*) -- threatened species;
- Northern Rocky Mountain Gray Wolf (*Canis lupus*) -- endangered species;
- Grizzly Bear (*Ursus arctos horribilis*) -- threatened species;
- Bull Trout (*Salvelinus confluentus*) -- threatened species; and
- Canada Lynx (*Lynx canadensis*) -- threatened species.

The westslope cutthroat trout (*Oncorhynchus clarki lewisi*) has been evaluated by the USFWS for possible listing as a threatened species under the *ENDANGERED SPECIES ACT*. On April 14, 2000, the USFWS concluded westslope cutthroat trout did not warrant listing as a threatened or endangered species. The peregrine falcon (*Falco peregrinus anatum*) is a species that may occur in the project area. Peregrine falcons have recovered through successful management activities and the species was removed from the Federal List of Endangered and Threatened Wildlife on August 25, 1999.

Bald Eagles. According to the *Montana Bald Eagle Management Plan* prepared by the Montana Bald Eagle Working Group in 1986, the project area falls within the Upper Columbia Basin Bald Eagle Management and Recovery Zone (Zone 7). Bald eagles may occur in the project area as spring and fall migrants or as summer resident and winter residents. Perch and roost trees are common along the Middle Fork of the Flathead River, and eagles prey upon the abundant fish populations in the river. No bald eagle nests are known to exist within 16 km (10± miles) of the project area. Since nesting habitat is present along much of the Middle Fork, it is possible that undiscovered nests occur in the area.

Northern Rocky Mountain Gray Wolf. The gray wolf is most likely to be present in the vicinity of the project as an incidental or dispersing animal. Tracks of the species have been observed and individuals are occasionally sighted in this general area. No den or rendezvous sites are known to occur in the area and there is no indication of wolf pack activity in the Middle Fork bridge project area. The project area falls within the Northwestern Montana Wolf Recovery Area that includes Glacier National Park, designated wildernesses, and adjacent public lands. The USFS has designated the river corridor and adjacent Flathead National Forest lands in the project area as Management Zone 1 gray wolf habitat. This designation implies that the project area contains key habitat components in sufficient abundance and distribution to sustain a viable wolf population(s).

Grizzly Bear. Grizzly bears occur as residents of the project area and have been sighted on the slopes of nearby mountains. Most of the sightings have occurred in the late summer and fall when bears are attracted to the area by the abundance of elk and mountain goats. The proposed project lies within Management Situation 1 grizzly bear habitat in the Northern Continental Divide Grizzly Bear Ecosystem, one of the designated grizzly bear recovery zones. Management

Situation 1 areas contain grizzly population centers and habitat components needed for the recovery of the species. This management situation designation applies only to USFS lands.

Bull Trout. The *ENDANGERED SPECIES ACT* status of the bull trout was revised from a proposed for listing to a "threatened" species on July 10, 1998. Bull trout found in the Flathead River system are considered to be part of the Columbia River population segment by the USFWS. The bull trout population in the Flathead system is largely migratory, growing to maturity in Flathead Lake and migrating through the river system to tributaries to spawn. Bull trout are known to spawn in tributaries of the Middle Fork like Ole Creek (located downstream of the proposed project) and Bear Creek located several kilometers upstream of the existing bridge. Both Ole Creek and Bear Creek are critical spawning streams for Flathead River bull trout.

Bull trout begin their spawning migration from Flathead Lake during April and move slowly upstream arriving in the Middle Fork during late June and July. Adult bull trout stage at the mouths of the spawning tributaries where they remain for two to four weeks. They move into the tributary streams at night from July through September with the majority entering in August. Spawning takes place in September and early October. The adult bull trout remain in the spawning tributaries for up to a month or more before spawning. After spawning the adults move out of the tributaries and down to Flathead Lake.

Most juvenile bull trout in the Flathead drainage remain in the tributaries for one to three years before emigrating to the river system. Emigration of juveniles from the tributaries takes place from June through August. The juveniles move rapidly downstream, arriving in the main stem of the Flathead River during August and September.

Bull trout are most abundant in the Middle Fork in the summer and early fall months and they may be present in small numbers during the spring and winter months. The most critical time for bull trout in the Middle Fork of the Flathead River is the July through September period.

Overall, the population of bull trout in the Middle Fork has been steadily declining in recent years. Recent monitoring data, indicating declining numbers of spawners, has caused concern about the trend of Flathead Lake migratory bull trout. Redd counts, measured since 1979, have shown a steady decline since 1988. According to the MONTANA BULL TROUT SCIENTIFIC GROUP (MBTSG), the decline in spawning populations of bull trout in virtually all monitored spawning streams throughout both the North and Middle Forks, indicate that changes in Flathead Lake and/or the Flathead River are the primary threat to bull trout at this time. The MBTSG did not identify physical habitat conditions in bull trout migratory corridors as a threat to bull trout but believes the cause of the recent decline in bull trout in the Flathead drainage is related to interactions with introduced species.

According to the listing action of July 10, 1998, the USFWS has found that critical habitat for the Columbia River population of bull trout is currently "not determinable" based on the best available scientific information about the species and its use of habitat in the project area.

Canada Lynx. In April 2000, the USFWS listed Canada lynx in the contiguous United States as a "threatened" species under the *ENDANGERED SPECIES ACT*. Montana is believed to contain one

of the few resident lynx populations in the lower 48 states. Lynx populations are believed to be more stable in Canada than those in the United States and some of the occurrences reported in Montana may be lynx that dispersed southward into Montana.

Historically, lynx were common in the Middle Fork of the Flathead River corridor. According to the *Environmental Assessment and Assessment of Effect for the Walton Area Plan* prepared by the NPS in December 2000, surveys for lynx have been conducted in the Park Creek and Ole Creek drainages. Although suitable habitat was found in these areas, no lynx were sighted. The MHNP database shows records of lynx from the project area or for adjoining townships. There are recorded sightings of lynx in Glacier National Park and surrounding counties.

Lynx habitat generally consists of climax boreal forest with a dense undercover of thickets and downed timber. Dense conifer woods are preferred habitat for denning and foraging. Large amounts of woody debris and minimal human disturbance are important features of denning sites. The primary prey for lynx is the snowshoe hare. The coniferous forest adjacent to US 2 in the project area may provide habitat for lynx, but the level of human disturbance makes the area generally unsuitable for the species.

Impacts of the Preferred Alternative - The potential impacts associated with constructing a new bridge across the Middle Fork of the Flathead River near Essex on identified T/E species are described below. Conservation and Coordination Measures for avoiding or minimizing impacts to T/E species are also highlighted in the following sections.

Bald Eagle. The Preferred Alternative would not directly alter existing or potential nesting, roosting, or perching habitat. Likewise, prey species (fish and waterfowl) commonly used by eagles would not be impacted. Construction activities during the spring and fall may temporarily disturb migrating eagles foraging close to the bridge site. This impact is considered minor since undisturbed habitat for displaced birds is abundant in the project area. It is unlikely that the proposed project would have any effect on wintering or migrating bald eagles.

Conservation and Coordination Measures:

- The project manager for the construction of the proposed bridge would contact an MDT biologist to assess the overall status of bald eagles in the project area prior to beginning work. Spatial, and/or time of work restrictions may be necessary if bald eagle nests are established in the project area prior to construction.

Gray Wolf. The availability of big game prey and isolation from human disturbance are key factors to suitable wolf habitat. The proposed project would not impact prey populations and there are moderate to high levels of human activity in the project area associated with the community of Essex, the Walton Ranger Station, US 2, and the dispersed recreation site along the Middle Fork near the existing bridge. This would preclude the use of the immediate area by wolves. Like other species, it is possible that construction activities could temporarily disturb or displace individual wolves to adjacent habitat. Given the level of human activity in the project area, few wolves would be displaced during construction.

Conservation and Coordination Measures:

- The project manager for the bridge replacement project would contact an MDT biologist to assess the overall status of wolves in the project area prior to beginning construction. Spatial, and/or time of work restrictions may be necessary if dens are established in the project area prior to construction.

Grizzly Bear. Grizzly bear use of the project area occurs infrequently throughout the year. The primary impact of the proposed action on grizzly bears is the potential for increasing bear-human conflicts due to the presence of workers and associated bear attractants such as food, petroleum products, etc. As with wolves, construction activities could temporarily disturb or displace grizzly bears to adjacent habitat. Since such habitat is abundant in the project area and the proposed action would not impact prey populations, impacts to grizzly bears would be minor.

Conservation and Coordination Measures:

- To minimize or prevent bear-human conflicts, the contractor would be required to use "grizzly-bear-proofed" garbage containers, keep food out of the reach of bears, and store petroleum products in contained trailers.
- On-site workers would be briefed on protocol for working in a high-use grizzly bear area.

Bull Trout. Bull trout are very sensitive to sediment, particularly in spawning areas. If the proposed project creates undesirable conditions in the river during bull trout migration it could affect bull trout behavior and spawning success.

Although unlikely, the Preferred Alternative could result in a direct mortality of bull trout if an individual fish were trapped inside one of the casings used to construct drilled shaft piers. The old concrete bridge piers would be removed through the use of explosives at the completion of the project. Blasting in the water can cause direct mortality of fish in the immediate area.

In stream work activities, like the construction of new bridge piers, removal of piers from the existing bridge after the new structure is built, and the construction of the new access road to the dispersed recreation site would have minor indirect effects on bull trout. In stream work would temporarily disturb the streambed and produce sediments that may subsequently degrade habitat (fill in stream bottom gravels) and/or affect food sources (i.e., harm macro invertebrates living on the stream bottom) for bull trout and other fish species.

Minor increases in suspended sediment concentrations downstream from the work site would occur during the construction of drilled shaft piers. However, the construction of drilled shaft piers would not generate large quantities of sediment since the work area would be totally enclosed. Once the casings for drilled shafts are in place, the construction area within the casing must be dewatered. Because the drilled shaft casing typically forms a tight seal with the river bed, once the construction area is dewatered, it should stay dry.

Pumping to dewater drilled shaft casings would be required if subsurface soils are porous and allow water to seep under the casing. The water that would be pumped from the construction area inside the casing would be high in suspended sediments. If this water were directly discharged

into the river, it would increase suspended sediment levels in the Middle Fork. However, MDT's standard construction methods prohibit such direct discharges and such actions are subject to the conditions of a Construction Dewatering - General Discharge Permit from the MDEQ.

Construction of the proposed access road along the river beneath the north end of the new bridge would require the placement of using rocks and other road fill material below the ordinary high water mark elevation at this location. A portion of the road would be built within the high water marks of the river channel, in an area that is considered to be a "Water of the U.S."

Riprap would be placed on the bank at each end of the new bridge. An estimated 76.2 linear meters (250 linear feet) of riprap would lie below the ordinary high water mark elevation at this crossing. This total represents combined linear measurements for riprap below the ordinary high water mark at both the north and south ends of the proposed bridge. Heavy equipment would operate on the river bank during construction of the access road. If the road were to wash out in a high flow event, fill material from the road would enter the river, adding to the suspended sediment load. However, because the suspended sediment load in the Middle Fork is very high during flood events, the additional sediment from the road fill would likely not be significant.

Work on the stream banks would remove minor amounts of riparian vegetation and leave areas of soils exposed during the construction period. If no erosion control is employed, surface runoff across disturbed areas could transport sediments to the river causing adverse effects on fisheries.

Explosives would be used to reduce the existing concrete piers to rubble and facilitate their removal. Piers would be wrapped in blasting mats to contain the debris. However, some of the debris (including some fine materials) would likely enter the river and the use of explosives could add trace amounts of nitrogen to the water. The installation and removal of piles for the contractor's work bridge would also cause temporary increases in sediment levels in the river.

Road sanding on the bridge and its approaches during the winter presently results in minor sediment impacts to the Flathead River. A substantial amount of road sand often accumulates on the sidewalk on the bridge and falls onto land beneath the bridge or in the river. Construction of a new bridge would not change this situation. Since the road sand enters the river during the winter and spring when few bull trout are likely to be present in the project area, the impact on bull trout would be minor.

Conservation and Coordination Measures:

- MDT proposes to construct new bridge piers using drilled shafts. This construction method for piers would limit streambed disturbance, confine sediment production since work would occur within casing, and allow in stream work to be completed relatively quickly.
- Work in the stream channel would be coordinated with the MDFWP and the USFWS. The timing of work in the channel and other restrictions would be indicated as conditions of approval for the issuance of a *124SPA* Stream Protection Permit from the MDFWP. The following timing restrictions on in stream activities that could increase turbidity would likely be included with this project:

- In stream pier construction would be restricted between July 1 and September 30 to minimize potential effects to migrating bull trout from increased sediment levels. This restriction would apply only to the construction of piers within the river and not to the construction of piers located in dry areas of the river bed.
 - Blasting to demolish the piers of the existing bridge would not be conducted during the critical migration and staging period for bull trout. This mitigation measure would reduce the probability of causing direct mortality due to blasting.
 - Construction of the access road within the river channel would be limited to low-water periods in the river so that this construction can be done "in-the-dry."
- The encased construction zone for bridge piers would be visually checked during dewatering to ensure bull trout are not trapped. If a bull trout were found trapped in a casing for a drilled shaft pier, it would immediately be moved into the river and the USFWS would be promptly notified. This measure would minimize the unlikely possibility of a mortality during pier construction.
 - Water pumped from within the casings for drilled shafts would be discharged into a settling pond where the sediment would be allowed to settle out before being discharged back into the Middle Fork. This measure would prevent additional sediment from entering the river. A Construction Dewatering - General Discharge Permit from the MDEQ specifying any treatment requirements must be obtained before dewatering any excavation.
 - The contractor's plans for the installation/removal and use of the work bridge would be reviewed and approved by MDT and the MDFWP.
 - MDT's Standard Specifications for Road and Bridge Construction would be required and enforced to ensure that surface waters are protected from pollution due to vehicle servicing or refueling, or leaks of fuels, oils, and other potentially toxic fluids. The Standard Specifications also outline requirements for safely siting construction staging and materials storage areas.
 - Best management practices for erosion control would be applied in the project area to minimize sediment transport to the Middle Fork. MDT would incorporate appropriate erosion control measures like:
 - promptly revegetating disturbed areas;
 - using silt fences or straw bales to prevent erosion and sediment transport;
 - using riprap or other stabilization measures on channel banks; and
 - minimizing the removal of riparian vegetation.
 - MDT has already entered into an agreement with the NPS regarding the revegetation of bridge demolition areas. Under the agreement, the NPS would be responsible for restoring vegetative growth on disturbed areas and obliterated fills. A copy of the Agreement is included in **APPENDIX E**.

- The need to encroach on and place fill material in the Middle Fork could be avoided if the river access site was moved to the other side of the river at Walton or to an alternate site downstream. Since such a relocation is not consistent with the NPS's plans for development at Walton, MDT's proposed design for the access road along the west bank of the Middle Fork minimizes the amount of encroachment on the river channel.

Canada Lynx. The most likely direct and indirect effects to Canada lynx associated with transportation improvements include habitat loss, habitat fragmentation, mortality, and disturbance. The Preferred Alternative would not result in any habitat loss for the lynx since the proposed project would occur primarily within existing highway right-of-way or on other lands not considered suitable for the species. Likewise, habitat fragmentation is not a concern. The existing conditions and development (US 2, the railroad, utilities, and the river) in the area create fragmented habitat and the proposed project would not contribute to further habitat fragmentation. The possibility of lynx occurring in the area is considered to be extremely rare and the likelihood that a lynx would be killed due to project activities or future use of the highway is remote.

The proposed project could disturb lynx. Habitat surrounding the project area is suitable for the species and the possibility exists that lynx could use habitat within 1.6 km (1 mile) of the bridge site. A lynx could be disturbed by human occupation and activity, noise, or machinery if it ventured into habitat near the project area during the construction of the proposed bridge. Such disturbance effects, even if they occurred, would be discountable and would not occur at a level that would result in a "take" of the species as defined by the *ENDANGERED SPECIES ACT*.

This proposed project would not contribute to a long-term increase in the human use of the area, a factor identified as a contributing impact warranting listing of lynx. However, construction of the proposed bridge would cause an increase in human activity in the area. Traffic accidents or construction related impacts could affect lynx habitat in the unlikely event that they caused a forest fire or other wide-ranging effects to important habitat.

While cumulative effects may be occurring from increased human use of lynx habitat in surrounding areas of Flathead County, the proposed action is not expected to contribute substantially to these effects. Activities on most of the lands in the surrounding area are controlled by federal agencies aware of the potential adverse effects that new development may have on lynx and other listed threatened and endangered species.

Conservation and Coordination Measures:

- Best management practices for erosion control would be applied within the project area.
- MDT's Standard Specifications for Road and Bridge Construction would be required and enforced to ensure that surface waters are protected from pollution due to vehicle servicing or refueling, or leaks of fuels, oils, and other potentially toxic fluids.
- Areas disturbed by the project would be promptly reclaimed with an NPS approved weed free soil and native plants and seeds to prevent erosion and reestablish vegetation.

Conclusion. This proposed project is **NOT LIKELY TO ADVERSELY AFFECT** the threatened bald

eagle, grizzly bear, gray wolf, or Canada lynx with the implementation of the Conservation and Coordination Measures described above.

The proposed bridge replacement is **LIKELY TO ADVERSELY AFFECT** the threatened bull trout. This conclusion was reached due to the necessity to work within occupied habitat for bull trout and the unlikely, but unavoidable, potential for harm to occur to an individual fish where construction takes place within the river. The implementation of the Conservation and Coordination Measures for bull trout listed above would minimize adverse effects on bull trout but would not eliminate the potential for harm to occur to an individual fish. Due to these potential effects to bull trout, MDT and FHWA entered formal consultation with the USFWS on September 20, 2000. Formal consultation should be concluded in March 2001. The results of this consultation will indicate whether this proposed project would have significant effects on bull trout or its habitat.

Impacts of the No Build Alternative - The No Build Alternative would not cause further impacts to any T/E wildlife species in the area of the proposed project.

b) Wildlife Species of Special Concern

In addition to those listed by the USFWS under the *ENDANGERED SPECIES ACT*, other wildlife species have been designated as sensitive or species of special concern by various federal and state agencies. One such species, the harlequin duck (*Histrionicus histrionicus*), occurs in the general vicinity and could be affected by the proposed bridge replacement. The USFS has designated harlequins as a "sensitive species" for the agency's Northern Region which includes the Flathead National Forest. This means the Regional Forester has identified the population viability of harlequins on the Flathead National Forest as a concern.

Harlequins are sea birds that migrate inland to swift mountain streams to nest and rear their young. The species prefers habitat with isolated low-gradient streams with boulder and cobble bottoms and banks covered with dense overhanging vegetation and woody debris. Harlequins are known to use area streams, including Ole Creek that flows into the Middle Fork downstream from this proposed project. A draft habitat conservation assessment prepared in 1996 for the USFS and the BUREAU OF LAND MANAGEMENT, identifies the Middle Fork as a breeding stream for harlequins and estimates between three and ten breeding pairs occur on the river. Pairs, juveniles, and individuals have been observed both upstream and downstream from the existing bridge. Harlequins may be present on the river anytime from March until September.

Because the habitat of harlequin ducks is so specialized, activities that adversely affect the availability of aquatic invertebrates used for food, stream flow, and water quality may be detrimental to the species. Harlequins are very sensitive to disturbance and are easily displaced. Depending upon the time of disturbance, nesting failure or loss of young could occur. Harlequins are believed to be more sensitive to in-stream disturbances during the pre-nesting through early brood rearing seasons (May through July) than later in the breeding season (August and September).

MDT has worked with the USFS and the NPS to determine the presence of harlequins and

quantify their use of habitat near the existing bridge. In April, 1998, MDT hired a wildlife biologist to monitor the area and help identify when harlequins are present, where the species occurs, and determine how harlequins use the habitat in the project area. Surveys were periodically conducted from April through September along a 5.6 km (3.5 mile) long reach of the Middle Fork both upstream and downstream of the existing bridge. Studies were also conducted during the harlequin breeding season on several streams flowing into the Middle Fork including Bear Creek, Java Creek, Sheep Creek, and Essex Creek.

The 1998 monitoring effort in the project area generated several findings regarding harlequins and their use of the Middle Fork in the project area. The key findings from the study are listed below:

- Harlequins were observed on seven occasions during the monitoring effort with all observations occurring on the Middle Fork.
- Most harlequin observations occurred during the months of April and May.
- Harlequins appear to be using the Middle Fork study area principally as a migration corridor and were observed feeding, resting, and traveling.
- No evidence of old or new harlequin nests were found and observations of broods suggest harlequins probably used upstream nesting sites.
- Observations suggest two or three harlequin pairs used the study area in 1998.
- More study needs to be done to identify how harlequins use the area and document whether human activities like bridge construction or recreation floating affects harlequins.

Impacts of the Preferred Alternative - The noise and human activities associated with building the new bridge would likely adversely affect the species since harlequins are very sensitive to disturbance and are easily displaced. Harlequin ducks would be unlikely to use suitable habitat in the bridge area during the time of construction. How this disturbance would affect harlequin movement and habitat use up or downstream of the bridge is unknown.

The wildlife biologist hired by MDT to monitor harlequin use of the project area concluded that while bridge construction may affect the species, the level of potential disturbance would not appear sufficient to warrant daily or seasonal timing restrictions on construction. The biologist recommended that in stream construction activities be limited during April and May. However, MDT believes implementing such a timing restriction for harlequins is not reasonable due to the short construction season in this area and because in stream work would likely be restricted during July, August, and September to minimize adverse effects on bull trout. If in stream activities were also limited during April and May, such work could only be done in June (traditionally a high water period) and from October to the time when winter conditions force work on the new bridge to stop. This would increase the amount of time required to build the new bridge, drive up project costs, and prolong the potential disturbance to harlequin ducks.

Currently, harlequins on the Middle Fork in the vicinity of the existing bridge are adversely affected by human activities on the river and along its banks. Commercial outfitters and individuals frequently float this section of river on rafts or kayaks. Overnight camping frequently occurs in the dispersed recreation site near the existing bridge. Opportunities for hiking and

picnicking along the river bank exist at the Walton Ranger Station.

Mitigating Measure:

- The temporary work bridge would be constructed with an opening wide and tall enough to allow for commercial rafts to easily pass. The required opening would be sufficient to allow harlequins to fly and swim through the construction zone.

Impacts of the No Build Alternative - This alternative would not impact harlequin ducks or other wildlife species of special concern. Human activities in the vicinity that are believed to adversely affect harlequins would continue with the No Build Alternative.

c) Other Wildlife

The project area provides habitat for a wide variety of birds, mammals, reptiles, and amphibians. Glacier National Park, the Middle Fork of the Flathead Wild and Scenic River, and the nearby wilderness support a rich diversity of wildlife species.

Impacts of the Preferred Alternative - Impacts to the wildlife species in the project area would include displacement during construction and the loss of minor amounts of habitats due to the project's construction. These impacts would be temporary and no long-term negative impacts or irretrievable losses to wildlife or habitat would occur with this project. Cumulative impacts of this project and other developments in the area would not result in a decline of wildlife species or numbers. Disturbances to native plant communities that provide habitat for wildlife would be minimized and unnecessary disturbance beyond the construction zone would be avoided.

Impacts of the No Build Alternative - This alternative would have no impact on wildlife species in the project area.

d) Fisheries

The Middle Fork provides quality habitat for a variety of fish species, including several sensitive species in Montana, and federally listed threatened and endangered species. According to the Montana Rivers Information System, the fish species present in the Middle Fork between Ole Creek and Essex Creek include:

<u>Species</u>	<u>Abundance</u>	<u>Use</u>
Bull Trout	Common	Migration corridor
Lake Trout	Present	Feeding run
Westslope Cutthroat Trout	Common	Corridor and resident or spawning
Sculpin	Present	Resident
Longnose Sucker	Common	Corridor and resident or spawning
Largescale Sucker	Common	Corridor and resident or spawning
Mountain Whitefish	Abundant	Corridor and resident or spawning

Please note that the term "common" shown in the table above is a subjective rating used by the MDFWP to indicate the frequency that bull trout might occur in this reach of the Middle Fork

based on past sampling efforts.

As discussed earlier, the Columbia River bull trout population was listed by the USFWS as a "threatened" species in 1998. Westslope cutthroat trout are a USFS sensitive species and a MDFWP Species of Special Concern. As indicated earlier, the USFWS determined in April 2000 that the westslope cutthroat trout did not warrant listing as a threatened or endangered species. The presence of lake trout (a non-native species) is a relatively recent occurrence likely associated with increased numbers of lake trout in Flathead Lake. Mountain whitefish are abundant in the Middle Fork. The other fish present in this reach of the river are non-game fishes and none are considered sensitive species.

Impacts of the Preferred Alternative - The impacts of this alternative on fisheries are expected to be minor. The most notable direct impacts to local fisheries would occur during construction when riparian vegetation at the locations of the new bridge abutments is removed and work to build piers in the channel is underway. Some temporary sediment input into the river is inevitable, however, efforts would be made to minimize such impacts.

Bull trout and westslope cutthroat trout are very sensitive to sediment, particularly in spawning areas. These species primarily spawn in tributaries to the Middle Fork such as Ole Creek located downstream of the proposed project. Both species use the Middle Fork of the Flathead River itself and tributaries both above and below the project area.

Demolition of the old bridge may require blasting to reduce the existing concrete piers to rubble to facilitate their removal. Blasting would have short-term adverse effects on fish and other aquatic organisms and their habitats. The shock waves and rapid changes in hydrostatic pressure associated with the detonation of explosives in or near water could stun, injure or kill bull trout and/or other fish species in the immediate vicinity of the demolition activity. The use of explosives may also cause some temporary changes to fish habitat. Blasting to demolish piers could elevate sediment levels downstream from the piers and may reduce or eliminate bottom-dwelling life forms that some fish use for food. The use of explosives to demolish bridge piers would not introduce chemical by-products into the river at concentrations that would be toxic to fish and other aquatic biota.

Measures that could reduce the potential for blasting to adversely affect bull trout and other aquatic species include controlling the blast with blankets or mats to contain debris and blasting when bull trout abundance in the Middle Fork is lowest. Demolition of the piers could be done without blasting but it would likely lengthen the time required to remove piers, require the use of heavy demolition equipment, cause additional noise and vibration effects, potentially introduce hazardous substances into the river, and would be substantially more expensive than blasting. Alternate demolition methods might in some way also pose a risk to bull trout and other fish near the piers being removed.

Mitigating Measures:

- MDT has already coordinated proposed work in the stream channel with the MDFWP, USFS, and the USFWS. Continued coordination would occur to establish desirable times

and any other special requirements for construction activities within the channel (including blasting to demolish existing bridge piers) that might cause harm to aquatic species or their aquatic habitats.

- Best management practices for erosion control would be applied in the project area to minimize sediment transport to the Middle Fork of the Flathead River.

Impacts of the No Build Alternative - This alternative would not impact fisheries.

e) Threatened/Endangered Plants

Two plant species in Montana, water howellia (*Howellia aquatilis*) and the Ute ladies'-tresses orchid (*Spiranthes diluvialis*), are listed as threatened by the USFWS. Ute ladies'-tresses occur along low-elevation, large river floodplains and have only been found in locations east of the Continental Divide. Suitable habitat for the species does not occur within the project area. Water howellia is limited to aquatic habitats in northwestern Montana. No habitat suitable for the species exists in the vicinity of the new crossing of the Middle Fork. Therefore, the Preferred Alternative and the No Build Alternative would have **NO EFFECT** on any T/E plant species.

f) Plant Species of Special Concern

An evaluation of plant species of special concern maintained by the MONTANA NATURAL HERITAGE PROGRAM (MNHP) was conducted for the proposed action. Thirty-one species listed by MNHP as occurring within 24 km (15± miles) of the proposed action were identified and evaluated for the likelihood of occurrence in the area. Seven of the species may exist in the vicinity of this proposed project based on the presence of general habitat parameters. These species include fringed onion (*Allium fibrillum*), Mingan Island moonwort (*Botrychium minganense*), pale corydalis (*Corydalis sempervirens*), Buckler fern (*Dryopteris cristata*), Giant helleborine (*Epipactis gigantea*), Short-flowered monkey flower (*Mimulus breviflorus*), and Kidney-leaf white violet (*Viola renifolia*).

None of these species were found during a field search of the project area done in June, 1997.

Impacts of the Preferred Alternative - Based on the results of the field search for plant species of special concern, no impacts to such species are anticipated from the implementation of the Preferred Alternative. If any impacts to these plant species would occur, the impacts would be minor and associated with construction and reclamation activities. No long-term negative impacts or irretrievable losses to rare and sensitive plants are likely to occur as a result of this proposed project. Since much of the area in the vicinity of the proposed bridge has already been impacted by previous highway and bridge development, the cumulative impacts of this project and others in the area would not result in a decline of these species or populations.

Impacts of the No Build Alternative - The No Build Alternative would not affect any plant species of special concern.

g) Vegetation

The project area is dominated by coniferous forest comprised of Douglas-fir, western larch, and spruce with some scattered lodgepole pine and ponderosa pine. Young cottonwood trees dominate the riparian zone/streambank habitat associated with the Middle Fork of the Flathead River with some grasses in the understory. The streambank is extremely rocky and does not facilitate dense growths of vegetation. Mullein, and clover are common in disturbed areas associated with the undeveloped river access site and its access road.

Various noxious weeds are present within the project area. Spotted knapweed, St. Johnswort, and Dalmatian toadflax are considered Category 1 species according to the Montana Noxious Weed List. Orange hawkweed is listed as a Category 2 weed species on the state list. Executive Order 13112 requires that federal agencies work to prevent and control the introduction and spread of invasive species. The intent of the Executive Order is to ensure that invasive species (like the noxious weeds listed above) do not choke out native plants and subsequently alter wildlife and fish habitat.

Impacts of the Preferred Alternative - The proposed project would result in the loss of an estimated $0.12 \pm$ ha ($0.29 \pm$ acres) of riparian habitat due to construction of the new bridge and its approaches and a new section of access road leading to the dispersed recreation site along the river. The habitat lost to construction involves primarily young cottonwood trees. Improvements to the road used to access the dispersed USFS recreation site west of the river or use of this site as a staging area for construction would impact lands previously disturbed by road and bridge construction and utility installations and now dominated by introduced weeds.

As indicated earlier in this Part, MDT would reestablish a permanent desirable vegetation community along all areas disturbed by the proposed construction. Through a cooperative agreement, the NPS would be responsible for revegetating areas disturbed during construction of the proposed bridge. If determined necessary through coordination with the NPS, USFS, or Flathead County, MDT would incorporate other special provisions into the contract for the construction of the new bridge to prevent the spread of noxious weeds. These actions would be consistent with the intent of Executive Order 13112.

Impacts of the No Build Alternative - This alternative would have no impact on vegetation within the project area.

11. Cultural, Archaeological/Historical Resources

A cultural resource survey was performed for this project by a cultural resource consultant in July, 1997. A record search identified two previously recorded historic sites in the general project area, the Walton Ranger Station Historic District (24FH397) and the Izaak Walton Inn (24FH233). The Walton Ranger Station Historic District is located southeast of the existing bridge adjacent to US 2 within Glacier National Park. The Walton Ranger Station Historic District, consisting of the ranger station, a residence, garage, woodshed, barn, and several other structures, was nominated to the NATIONAL REGISTER OF HISTORIC PLACES (NRHP) in 1984. The

Izaak Walton Inn is a NRHP-eligible building located in Essex.

A field inventory of the project area identified two previously unrecorded buildings on the west side of US 2 opposite the Walton Ranger Station Historic District. The buildings included a collapsed outhouse and a pump house which supplies water to the ranger station and adjacent campground. Both buildings are located outside the boundaries of the historic district. Although the collapsed structure was likely associated with the Walton Ranger Station, it was not recommended as eligible for inclusion in the NRHP because it lacks integrity. The pump house is a modern (1972) structure and was not recommended as an eligible element of the Walton Ranger Station Historic District. A comment letter from the Montana SHPO concurring with these recommendations is included in **APPENDIX B**.

Copies of MDT's cultural resource report were provided to the USFS and NPS for review.

Impacts of the Preferred Alternative - The Preferred Alternative would not impact the Walton Ranger Station Historic District since the proposed alignment of US 2 in the area would be shifted away from the historic district. The grade of the new road would be similar to that of the existing highway and construction limits would not encroach beyond the existing right-of-way for US 2.

There would be no impact on the Izaak Walton Inn since the structure is outside of the area of potential effect for the proposed bridge replacement.

Federally-funded actions affecting historic sites that are on, or considered as eligible for the NRHP also must comply with *Section 4(f)* of the *U.S. DEPARTMENT OF TRANSPORTATION ACT* of 1966, as amended (**49 U.S.C. 303**). This compliance is discussed later in Part IV.

Impacts of the No Build Alternative - The No Build Alternative would not affect any known cultural, historical or archaeological resources in the project area.

12. Air Quality

This proposed bridge replacement project is located in an "unclassifiable" attainment area of Montana for air quality under 40 CFR 81.327, as amended. As such, the project is not covered under the U.S. ENVIRONMENTAL PROTECTION AGENCY's (EPA's) **Final Rule** of November 24, 1993 on Air Quality conformity. Therefore, the proposed project complies with *Section 176(c)* of the *CLEAN AIR ACT* (**42 U.S.C. 7521(a)**), as amended.

Projects like this proposed bridge replacement are actions whose individual and cumulative effects would be minor and would not effect regional emissions. These conclusions can be made on the basis of analyses done for many similar projects across the country. For these reasons, neither the Preferred Alternative nor the No Build Alternative would produce adverse air quality impacts.

13. Noise

This project involves reconstruction of a bridge and its approaches with very minor changes in horizontal alignment. The project would not increase the number of through traffic lanes on the new structure or its approaches. Due to the nature of this project and its rural location, a detailed noise analysis is not required. Design Year noise levels would not exceed the Noise Abatement Criteria 23 CFR 772. Traffic noise level increases would be insignificant with the construction of the Preferred Alternative and with the No Build Alternative.

14. Farmlands

The Preferred Alternative and the No Build Alternative would not affect farmland. The project area consists of public lands located within the Flathead National Forest and Glacier National Park. There are no private lands in the project area used as farmland. Because the lands affected by the proposed project have previously been converted to right-of-way for US 2 and are managed for public recreational uses and activities, the *FARMLAND PROTECTION POLICY ACT* of 1981 does not apply. For this reason, Form AD 1006 was not prepared or submitted to the NATURAL RESOURCES CONSERVATION SERVICE (NRCS).

15. Hazardous Substances

Impacts of the Preferred Alternative - The only known source of hazardous wastes for this proposed project are associated with the equipment used for construction of the new bridge and roadway. These are the fuels, lubricants, hydraulic fluids, and related items needed for the contractor's vehicles and equipment.

As a condition of the implementing the Preferred Alternative, the contractor would have to take precautions to minimize the effects of construction operations and to prevent leakage or spilling of fluids from construction equipment. The contractor would be required to store petroleum products in contained trailers to prevent grizzly bears from encountering such substances.

Impacts of the No Build Alternative - This alternative would have no impacts on hazardous waste sites, generators, or substances.

16. Section 4(f) of the U.S. DEPARTMENT OF TRANSPORTATION Act

Section 4(f) of the U.S. DEPARTMENT OF TRANSPORTATION ACT of 1966 (**49 U.S.C. 303**), as amended, provides for the protection of publicly-owned parks, recreation lands, historical sites, and wildlife and waterfowl refuges. This ACT preceded the adoption of the *NATIONAL ENVIRONMENTAL POLICY ACT* of 1969 and requires a separate evaluation of protected areas.

MDT identified significant historic sites in the project area, contacted the administrators of public recreational lands, and consulted FHWA guidance to determine properties subject to protection under *Section 4(f)*. The *Section 4(f)* properties affected by this proposed action include:

- the Middle Fork of the Flathead Recreational River and its Management Corridor;
- Glacier National Park (Walton Area); and
- the Walton Ranger Station Historic District.

Glacier National Park is a public park of national and international significance. This proposed project would affect lands within the proposed visitor services zone for the Walton area of Glacier National Park.

Publicly-owned waters of designated National Wild and Scenic Rivers are protected under *Section 4(f)* of the *DEPARTMENT OF TRANSPORTATION ACT*. Publicly-owned lands in the immediate proximity of such rivers may also be protected by *Section 4(f)* depending on the manner in which they are administered. *Section 4(f)* does not apply unless specific uses, as identified in the statute, exist on those portions of the land needed for the highway project. Since the public lands adjacent to the river are located within the defined management corridor for a Recreational Segment of the Flathead National Wild and Scenic River, MDT concluded these areas are also be subject to *Section 4(f)*.

The Walton Ranger Station Historic District, located within Glacier National Park, is adjacent to the southwest side of the proposed project. The Walton Ranger Station Historic District has prescribed district boundaries and was listed in the NRHP in 1986.

Correspondence with the USFS, NPS, and the MDFWP showing coordination with the agencies about *Section 4(f)* properties is included in **APPENDIX B**.

Impacts of the Preferred Alternative - The Preferred Alternative would affect the Recreational River segment of the Middle Fork of the Flathead National Wild and Scenic River and lands within its management corridor. Construction of piers and abutments for the new bridge would occur within the Wild and Scenic River. Portions of a dispersed recreation site on USFS land would be used as a staging area for bridge construction and public recreational use of this site may be restricted during the construction period. The proposed action would also require a permanent change in the approach from US 2 by moving the approach from the west to the east side of the highway. A short section of road leading from the highway and passing under the north end of the new bridge would be constructed to maintain access to the dispersed recreation site. Discussions relevant to the anticipated effects to the Wild and Scenic River segment can also be found under various sections of this Part including: **6. Water Resources and Quality; 7. Wild and Scenic Rivers; 18. Recreation Impacts; and 19. Visual Impacts.**

The Preferred Alternative would require Glacier National Park to grant an easement for 1.24 ha (3.07 acres) of park lands. The lands requested are within the visitor service zone of the Walton developed area. The 3.07 acres includes most of the existing highway and lands that MDT already has authorized use of and an additional 0.39 ha (0.97 acres) between Highway 2 and the Middle Fork.

This proposed project would increase the total area devoted to the operation and maintenance of US 2 within Glacier National Park by 0.39 ha (0.97 acres). Approximately 0.22 ha (0.54 acres) of park lands now authorized for US 2 would no longer be needed. MDT would restore this land to

natural conditions.

Glacier National Park's Walton Ranger Station Historic District is immediately adjacent to the southeasterly side of this proposed project. However, the construction limits for the proposed bridge replacement project would remain within US 2's current authorized area and would not encroach upon the historic district. The shift in the location of the new bridge would move traffic and attendant noise farther away from the Walton Ranger Station Historic District.

Section 4(f) properties and the impacts of this proposed project are addressed in detail in Part V of this document.

In mid-1983, the FHWA developed "Nationwide" Programmatic *Section 4(f)* Evaluation forms for projects requiring minor uses of land from NRHP-eligible historic sites and public recreation lands. These forms are *separate* documents from the Environmental Assessment, and are only intended to programmatically demonstrate compliance with the provisions of *Section 4(f)*. Copies of completed "Nationwide" Programmatic *Section 4(f)* Evaluation forms for this proposed project's effects on the Middle Fork of the Flathead National Wild and Scenic River, Glacier National Park (Walton Area), and the Walton Ranger Station Historic District can be found in **APPENDIX D**.

Impacts of the No Build Alternative - This alternative would not affect the Walton Ranger Station Historic District or increase effects beyond those already occurring to the Middle Fork of the Flathead Wild and Scenic River or lands in Glacier National Park.

17. *Section 6(f)* of the National Land & Water Conservation Fund Act

Section 6(f) of the NATIONAL LAND & WATER CONSERVATION FUND ACT (16 U.S.C. 460) requires that coordination be undertaken to determine if federal funds were used to acquire or improve any lands in the project area for recreation or water conservation purposes. A review of the MDFWP's detailed listing of Land & Water Conservation Fund grants shows no *6(f)* locations in the area of this proposed project. Therefore, neither the Preferred Alternative nor the No Build Alternative would affect *Section 6(f)* lands.

18. Recreation Impacts

Recreation within the project area occurs at the Walton Ranger Station in Glacier National Park, on the Middle Fork of the Flathead and its banks, and on lands in the Flathead National Forest. With the exception of picnicking at NPS facilities at the Walton Ranger Station, a variety of "dispersed" recreation activities are practiced by the public on unimproved sites over a wide area. Dispersed recreation activities tend to be day-use oriented and include hunting, fishing, berry picking, off-road vehicle use, hiking, horseback riding, picnicking, camping, viewing scenery, and others. Activities at the dispersed recreation site near the existing bridge include launch/retrieval for recreational floaters and commercial rafting outfitters, fishing, and short-term camping.

Impacts of the Preferred Alternative - MDT proposes use of the dispersed recreation site near the existing bridge as a staging area for the construction of the new bridge. This location is convenient to the proposed bridge work area and offers one of the few usable sites for this activity in the project area. Use of the dispersed recreation site would be disrupted for up to two seasons during the construction of the new bridge. Storing equipment and supplies, erecting a work bridge, and the noise and other activities associated with bridge construction would impair the recreational use of the area during the construction period. Signs would be posted by MDT indicating the dispersed site is closed for the duration of the project. Restoration of the site at the conclusion of the project would ensure there are no long lasting impacts on the dispersed recreation site.

The proposed new alignment for the highway and bridge would change the way the recreation site is accessed from US 2. Presently, the site is accessed via an approach on the west side of US 2 near the north end of the structure. The USFS requested a relocation of the access road entrance to increase traffic safety. MDT would accommodate this request by moving the approach to the east side of US 2 some $90 \pm$ m ($295 \pm$ feet) north of the new bridge. A section of road must be built down the river bank and under the north end of the new bridge to maintain future access to the recreation site.

Recreational use of the river and riparian lands would continue both upstream and downstream from the project area during construction. As indicated earlier, the contractor would be required to construct work bridges in a manner that would allow continued floating on the Middle Fork through the construction zone. Signs warning river users of the potential obstruction to floating near Essex would also be erected at the Bear Creek put-in located more than 8 km (5 miles) upstream and along the river bank upstream from the construction site.

Impacts of the No Build Alternative - There would be no impacts on recreational use lands in the project area associated with the No Build Alternative.

19. Visual Impacts

A visual impact assessment for this project was prepared for MDT by a consulting landscape architectural firm in November, 1997. The assessment was completed according to the FHWA's recommended guidelines described in its publication *Visual Impact Assessment for Highway Projects* (FHWA-HI-88-054). The assessment identified the existing visual character and quality, established viewer groups, and evaluated the visual impacts associated with the proposed construction of a new bridge over the Middle Fork. Copies of the visual impact assessment for this project are on file with MDT Environmental Services.

Mountainous landforms dominate the landscape in the project area due to their immense scale and the fact that peaks rise to elevations of more than 2,300 m (7,600 feet) on the visible skyline. The steep slopes rising from the valley floor of the Middle Fork of the Flathead River obscure views of the Great Bear Wilderness Area located to the south and west of the highway. Human development is sparse due in part to the remoteness and physical constraints of this area. The main developments include the railroad, highway, and scattered buildings.

The quality of the visual environment in the project area is considered moderately high. The highway and railroad in the area offer unique and memorable vistas of a pristine Wild and Scenic River combined with the rugged terrain of Glacier National Park. The color and scale of the few buildings present in the project area help to maintain an intact landscape with an absence of major manmade encroachments. Cut slopes and steep embankments associated with the railroad and highway are only minimally obtrusive in the landscape of the project area. Visually sensitive resources in the project area include Glacier National Park and the Middle Fork of the Flathead Wild and Scenic River.

The major viewer groups that see the existing facility and those who would see the completed project include residents in the immediate area of the river crossing, recreational users of the Middle Fork of the Flathead River, AMTRAK passengers, and highway users. **FIGURE 7** shows the appearance of the existing bridge from the highway user's perspective.

Impacts of the Preferred Alternative - The new bridge proposed for the Middle Fork would vary from the existing structure in three main respects: 1) the proposed bridge would be straighter and wider; 2) the approaches to the new bridge would be offset slightly to the upstream side of the existing bridge; and 3) the new bridge would have a different design and appearance than the existing structure. The proposed bridge would virtually eliminate the existing curved alignment and would provide a notably wider road surface on the bridge's deck. Fill for the new road embankments would cover areas that were previously disturbed by road and bridge construction and utility installations. The main structural components likely to be used for the proposed bridge would be different than the existing structure causing a slight change in appearance. **FIGURE 3** in Part III shows the probable appearance of the proposed bridge.

The visual landscape for those in rafts floating beneath the bridge would be dominated by views of the bridge, structural members beneath the bridge deck, and its piers. The new bridge would require one less pier in the river channel than the present structure. The riprap at each end of the new bridge, fill slope for the new access road to the dispersed recreation site, and the gabion retaining wall would also be seen from the river.

The Preferred Alternative would not alter views of the background landscape in the project area. However, this alternative would cause minor changes to the foreground landscape of the project corridor for users of the facility and for those who view the bridge from a distance. The changes in the visual environment resulting from this alternative would be most apparent to hikers on the Boundary Trail located along the river in Glacier National Park, recreationists using the river access and dispersed recreation site along the river, and motorists approaching the bridge from the north.

The visual impact assessment prepared for this proposed project examined the potential impacts from twelve selected viewpoints. The evaluation showed that minor adverse effects to visual quality would occur at seven viewpoints. The study also showed that visual quality would be positively affected at three viewpoints or remain unchanged at two other viewpoints. Overall, the visual resource assessment concluded that the visual quality of the area would not be greatly affected by the proposed bridge replacement.



View of east approach of existing bridge.



View of west approach of existing bridge.

Figure 7
Driver's Perspective of
Existing Bridge

A gabion retaining wall would be constructed on the fill slope for the north bridge end between the proposed access road to the dispersed recreation area adjacent to the river. Rocks used in the gabion wall would attempt to match the red and green colors of native river rocks at this site to ensure a compatible appearance.

The potential visual impacts of the project would be mitigated by the construction of uniform and smooth cut and fill slopes shaped to blend with the surrounding terrain. Roadside slopes would be promptly revegetated with desirable plants to control erosion and inhibit invasion by noxious weeds. The Preferred Alternative would result in minor, short-term visual impacts during construction including vegetation clearing until revegetation occurs; the stockpiling excavated material, equipment, and material; and minor dust and debris from construction activities.

Impacts of the No Build Alternative - There would be no visual impacts associated with the No Build Alternative.

20. Considerations Relating to Pedestrians and Bicyclists

US 2 in the project area receives occasional use by long-distance bicycle tourists. The existing bridge deck is 9.1± m (30± feet) wide from curb-to-curb and accommodates two 3.6± m (12-foot) wide travel lanes and two 0.9± m (3-foot) wide shoulders. The narrow roadway shoulder on the bridge and its approaches are usable by bicyclists.

A 0.9± m (3-foot) wide pedestrian walkway, separated from the highway by a railing, exists along the easterly (downstream) side of the structure. The walkway allows pedestrians to cross the Middle Fork from the Walton Ranger Station. The ends of the existing walkway were made wheelchair accessible under Project NH 1-2 (71) 180, completed in 1995.

Impacts of the Preferred Alternative - The Preferred Alternative would provide two 2.4± m (8.0±-foot) wide shoulders for use by pedestrians and bicyclists. The wide shoulders would offer a pedestrian and bicycle facility much improved over the existing bridge's 0.9± m (3-foot) wide shoulders and 0.9± m (3-foot) wide separated walkway. The low level of use, both vehicular and pedestrian, does not justify the expense of providing a separated sidewalk on both sides of the proposed bridge.

Impacts of the No Build Alternative - There would be no change in the facilities available for use by bicyclists or pedestrians with the No Build Alternative.

21. Secondary and Cumulative Impacts

Secondary (or indirect) effects are those that are caused by an action and are later in time or farther removed in distance but are still reasonably foreseeable. Secondary impacts are generally induced by the initial action and comprise a wide variety of effects such as, changes in land use, water quality, economic conditions, or population density. The most notable secondary impact of the proposed action is the potential restriction or loss of recreational opportunities at the dispersed USFS recreation site on the Middle Fork during the construction period. Other

secondary impacts of this proposed project are discussed in appropriate sections of this Part.

Cumulative impacts are those effects that result from the incremental consequences of an action when added to other past and reasonably foreseeable future actions regardless of what agency (federal or non-federal) undertakes such actions.

Projects planned, under construction, or recently completed by MDT and others in the vicinity were reviewed to help assess the cumulative impacts of this project. MDT currently has one active project, two planned projects, and one tentative project on US 2 within 80 km (50 miles) of Essex not including this proposed project. MDT's proposed projects are described below:

Midvale Creek - East Glacier; BR 1-3 (43) 209; Control No. 3086 - an active bridge replacement project over Midvale Creek on US 2 at the west edge of East Glacier. This project falls within MDT's Great Falls District No. 3. This project is located about 47 km (29 miles) east of the Middle Fork Flathead River Bridge - SE Essex project.

Columbia Heights-East; NH 1-2(68) 138F; Control No. 1290 - a planned reconstruction project on 4.2 km (2.6 miles) of US 2 scheduled for construction in Fiscal Year 2003. This proposed project falls within MDT's Missoula District No.1. The Columbia Heights-East project begins about 70 km (44 miles) west of the Middle Fork Flathead River Bridge - SE Essex project.

Hungry Horse-West Glacier; SFCN-STPHS 1-2(105) 142 - a tentative pavement overlay and seal and cover project on 17.8 km (11.0 miles) of US 2 between Hungry Horse and West Glacier. This proposed project falls within MDT's Missoula District No.1 but has not been programmed for construction at this time. The potential project ends about 46 km (29 miles) west of the Middle Fork Flathead River Bridge - SE Essex project.

Two pavement preservation projects on US 2 near Essex were undertaken and completed during 2000. The Java-Summit and Marias Pass-East projects were located 6 km (4 miles) and 29 km (18 miles), respectively, east of the proposed bridge replacement near Essex.

The proposed Middle Fork bridge replacement near Essex is currently scheduled to be let to contract in May 24, 2001. Because MDT's other active, planned or tentative projects are located substantially away from the proposed bridge replacement at Essex and work on the projects would not occur simultaneously, the cumulative environmental impacts on this proposed project would be minimal. Similarly, this proposed bridge replacement would have no significant cumulative environmental impacts on other proposed projects in MDT's Missoula and Great Falls Districts.

The NPS is currently considering parking and trailhead facility improvements adjacent to the Walton Ranger Station. The improvements would include parking for passenger and oversized vehicles with horse trailers, improved area orientation and information facilities, an accessible loading ramp for stock users, a vault toilet, and replacement housing for staff. The NPS prepared a separate environmental assessment for the proposed improvements at Walton and initially

distributed the document for comments in September 2000. The NPS issued a revised version of the Walton area environmental assessment for another 30 days in December 2000 to allow for public review and comment on a Section 7 Analysis in accordance with the *WILD AND SCENIC RIVERS ACT*. During the public comment period on the initial environmental assessment, the Flathead National Forest requested the NPS to conduct this analysis and add it to the environmental assessment.

Contacts with the NPS during February 2001 indicate that the agency has suspended work to implement the project at Walton. The likely timeframe for the NPS to complete its environmental compliance requirements and build the proposed improvements at Walton would be after MDT's bridge project is completed.

During the development of the environmental assessment for the improvements at Walton, the NPS and MDT discussed the possibility of using the area where the parking facilities would be built as a staging area for MDT's contractor. However, due to uncertainties about the timing and implementation of MDT's bridge project and the NPS's project, the use of land at Walton by MDT's contractor was dropped from consideration.

The cumulative impacts associated with MDT's proposed bridge replacement project combined with the NPS's possible trailhead and parking improvements at Walton would be limited. The majority of the lands affected by the proposed bridge replacement and improvements at Walton have been impacted by past road and bridge development, utility installations, and other human activities. The proposed projects may create temporary, but adverse cumulative effects on wildlife due to construction noise and activities. The potential for short-term adverse effects on water and air quality would also be increased with these projects since soils in the area would be disturbed and work would occur in the river and on adjacent lands. However, negligible cumulative effects on soils and aquatic resources are anticipated because disturbed lands would be reclaimed and no other land disturbing projects are planned in this immediate vicinity.

The proposed bridge replacement combined with the proposed improvements at Walton may have a minor, temporary cumulative impact on visual resources by changing the views of roadside areas for travelers on US 2 and for river users. These effects are not expected to be significant because the new parking area at Walton would be designed to blend in with the landscape. Disturbed areas adjacent to the highway would be promptly planted with native types of vegetation and the existing bridge would be removed at the completion of the project. For these reasons, the cumulative changes in the visual appearance of the project area would be minor.

The projects could result in temporary inconveniences to river users and other visitors to this region of Glacier National Park and the Flathead National Forest. A short-term cumulative effect on recreation would occur if simultaneous construction of the new bridge and proposed NPS facilities at Walton were deterred visitors from recreating on public lands in the Essex area or increased recreational use of other nearby lands. This cumulative effect would be minor given the many possible outdoor recreation sites and other river access available in the general area.

The change from a curved to a more tangent (straight) alignment across the new bridge could induce some motorists on US 2 to travel at higher speeds across the bridge.

The proposed projects would not result in cumulative impacts on cultural resources, socio-economic conditions, energy, or overall land uses in the Essex area. A beneficial, cumulative economic effect could occur if construction employees or delayed visitors choose to spend money at businesses in the Essex-Pinnacle area.

22. Construction Impacts

As indicated earlier, construction of the new bridge and its approaches would likely occur over two construction seasons beginning after bids are opened during the Spring 2001. The dispersed recreation site southwest of the existing bridge would be used as a staging area for construction activities and materials storage.

The likely sequence of major work activities for the proposed bridge replacement project is identified below.

1. Set up traffic control to protect highway users and establish construction staging area at dispersed recreation site. Close dispersed recreation site to public use.
2. Build a work bridge(s) along the proposed alignment between old and new bridge sites and bring in crane for use on the work bridge.
3. Build the substructure (piers) for new bridge using drilled shafts.
4. Construct the concrete caps on bridge piers.
5. Bring in girders by truck and set structural steel (girders may either be placed in staging area or erected directly off the truck).
6. Form up the new bridge's deck and pour the concrete bridge deck.
7. Complete the construction of US 2 approaches to new bridge.
8. Dismantle old bridge and remove from project site, remove work bridge.
Complete work to construct new access road to dispersed recreation site.
9. NPS would restore/revegetate disturbed areas.

Impacts of the Preferred Alternative - There are several impacts associated with the construction of improvements for the Preferred Alternative. These construction-related impacts are described below:

Noise and Vibration. The operation of heavy machinery like earth moving equipment, paving equipment, power tools, and trucks would create periods of undesirable noise in the project area. Noise due to construction activities would produce short-term impacts for visitors at dispersed and/or developed recreation sites within Flathead National Forest and Glacier National Park. Construction-related noise may also temporarily displace some wildlife and bird species from the area or deter such species from using habitats in the vicinity of the bridge. Pile driving activities associated with the construction of bridge piers and work bridges would generate both noise and vibration impacts that may bother residents of the Parma Subdivision. Construction noise may be perceived as being louder than it really is due to low background noise levels within the project area.

Dust. The operation of heavy equipment on disturbed areas could produce dust.

Water Quality. Runoff from disturbed surface areas has the potential to enter the Middle Fork of the Flathead River and adversely affect its water quality. Additionally, the construction of concrete piers in the river channel provides an opportunity for contaminants to enter surface waters. Petroleum products and other materials could be spilled during the operation and maintenance of equipment needed to build the new bridge and its approaches.

Some temporary adverse impacts would occur with the installation and removal of the necessary work bridge(s). MDT may suggest that the contractor remove the work bridge(s) at the end of the first or subsequent construction seasons so the structures won't sustain damage or wash out during spring runoff the following year.

Visual. Stockpiles of materials and equipment needed for the construction of the new bridge and roadway may cause short-term adverse impacts for local residents and others passing through the project area.

Traffic. Few, if any, disruptions to traffic are anticipated since the existing bridge and road would remain in use during the construction period. The existing facilities would be removed after construction of the new bridge and its approaches is completed.

At the present time, no source of embankment (fill) material needed for construction of the project has been identified. Since excavation for this project would be minimal, the contractor must identify a borrow source and truck the needed material to the work area. This would cause a minor increase in traffic on US 2 and other roads used for travel to and from the borrow area.

Construction impacts would be mitigated through the implementation and enforcement of control measures during construction. Such measures would include:

- The contractor would be subject to all state and local laws to minimize construction noise by having mufflers on all equipment.
- Dust generated through construction activities and road use would be controlled by the required use of either water or another approved dust suppressant.
- Erosion control measures would be employed to prevent sediments from reaching the Middle Fork.
- Temporary or permanent seeding and mulching would be used to control erosion of disturbed areas.
- The contractor would be required to have plan for implementing appropriate measures in the event of an accidental spill.
- Dewatering measures would be implemented to ensure that water removed from pier

- Dewatering measures would be implemented to ensure that water removed from pier construction areas are not released without appropriate treatment.

All work related to the Preferred Alternative for the proposed bridge replacement project would be subject to the provisions included in the current edition of Standard Specifications for Road and Bridge Construction as adopted by MDT and the Montana Transportation Commission.

Impacts of the No Build Alternative - The only construction impacts associated with this alternative would be related to the completion of minor maintenance activities on the existing road and bridge.

23. Permits Required

The No Build Alternative would not require any permits. However, the Preferred Alternative for the proposed bridge replacement project would require the following permits to be obtained prior to any relevant disturbances:

- **Section 3(a) Authorization/124SPA** - This proposed project would be in compliance with the provisions of both Water Quality for *Section 3(a)* authorizations under **75-5-401 (2) M.C.A.** and Stream Protection under **(87-5-501 through 509 M.C.A., inclusive)**.

A **124SPA** Stream Protection Permit is required by the MDFWP.

All work would also be in accordance with the *WATER QUALITY ACT OF 1987 (P.L. 100-4)*, as amended.

- **318 Authorization** - This proposed project would require a Short-Term Water Quality Standard for Turbidity Related to Construction (*318 Authorization*) under **75-5-318, M.C.A.** from the MDEQ Permitting and Compliance Division.
- **Section 402 Permit** - This proposed project would require a *CLEAN WATER ACT (33 U.S.C. 1251 - 1376) - Section 402*/Montana Pollutant Discharge Elimination System Permit from the MDEQ Permitting and Compliance Division.
- **Section 404 Permit** - A *CLEAN WATER ACT (33 U.S.C. 1251 - 1376) - Section 404* permit from the COE would be required for placing fill in wetlands or for the discharge of dredged or fill material associated with bridge and pier construction or bank stabilization. The COE would determine if proposed project qualifies for a "Nationwide" permit under the provisions of 33 CFR 330.

Although rafting outfitters use the Middle Fork, the river in the project area is not considered to be "commercially navigable" by the State of Montana. As such, there is no need to obtain a Land Use License from the DRN&C for the proposed river crossing.

V. "Nationwide" Programmatic *Section 4(f)* Evaluations

V. "NATIONWIDE" PROGRAMMATIC SECTION 4(f) EVALUATIONS

A. Introduction

According to 23 CFR 771.135(a) "The Administration may not approve the use of land from a significant publicly owned public park, recreation area, or wildlife and waterfowl refuge or any significant historic site unless a determination is made that:

- (i) There is no feasible and prudent alternative to the use of land from the property; and
- (ii) The action includes all possible planning to minimize harm to the property resulting from such use."

The purpose of this *Section 4(f)* Evaluation is to identify affected properties, assess the impacts of the Preferred Alternative on the properties, and to demonstrate that the proposed bridge replacement project complies with the requirements of *Section 4(f)* of the *U.S. DEPARTMENT OF TRANSPORTATION ACT* of 1966 (**49 U.S.C. 303**), as amended.

A description of the proposed action, its purpose and need, and the alternatives considered for this proposed project can be found in Parts I, II, and III of the Environmental Assessment.

B. *Section 4(f)* Properties

1. Properties Initially Considered

The project area contains public recreational lands and a historic site which were examined for their applicability to *Section 4(f)*. National Register of Historic Places (NRHP)-eligibility determinations for historic sites and contacts with the administrators of public recreational lands helped identify properties potentially subject to *Section 4(f)*. Properties considered in this evaluation are identified below.

The Middle Fork of the Flathead Wild and Scenic River. The Middle Fork of the Flathead River in the project area is part of the National Wild and Scenic River System under the *WILD AND SCENIC RIVERS ACT* (**16 U.S.C. 1271-1287**). Publicly-owned waters of designated Wild and Scenic Rivers are protected by *Section 4(f)*. The statute is also applicable to lands within designated Wild and Scenic River areas which are being used, or designated under an approved management plan for use as a park or recreation site; wildlife, or waterfowl refuge; or for historic purposes. *Section 4(f)* does not apply unless specific uses, as identified in the statute, exist on those portions of the land needed for the highway project. Since the public lands adjacent to the river are located within the defined management corridor for a Recreational Segment of the Flathead National Wild and Scenic River, MDT concluded these areas are also be subject to *Section 4(f)*.

Dispersed Recreation Site on the Middle Fork. This site is located on Flathead National Forest lands along the west bank of the Middle Fork upstream from the existing bridge. The site is located within the management corridor of the Recreational River segment of the Wild and Scenic River. According to the *Forest Plan* for the Flathead National Forest, "dispersed recreation" is that type of recreation use related to and in conjunction with roads and trails that require few if any improvements and may occur over a wide area. Dispersed recreation activities tend to be day-use oriented like hunting, fishing, berry picking, off-road vehicle use, hiking horseback riding, picnicking, camping, viewing scenery, and others. Activities at the dispersed recreation site include launch/retrieval for recreational floaters and commercial rafting outfitters, fishing, and short-term primitive camping.

MDT does not consider the dispersed USFS recreation site along the Middle Fork to be a *Section 4(f)* property because the area is not managed specifically for a *Section 4(f)* use. The site lies within the USFS's Management Area 18 that is designated for lands adjacent to Wild and Scenic River segments throughout the Flathead National Forest. Other than a road providing access to the river, no recreational or sanitary facilities exist at the dispersed recreation site.

Glacier National Park. Glacier National Park is a public park of both national and international significance. The Park, together with Waterton Lakes National Park in Alberta, comprises the Waterton-Glacier International Peace Park. Glacier National Park and Waterton Lakes National Park have also been designated as an International Biosphere Reserve and as a World Heritage Site. The Walton area of the Park is located adjacent to this proposed project.

Walton Ranger Station Historic District. The Walton Ranger Station Historic District, located within Glacier National Park, is adjacent to the southwest side of the proposed project. The Walton Ranger Station Historic District has prescribed district boundaries and was listed in the NRHP in 1986. This important historic site is subject to *Section 4(f)*.

2. Description of *Section 4(f)* Properties

a) Middle Fork of the Flathead Wild and Scenic River

The North, Middle, and South Forks of the Flathead River were added to National Wild and Scenic Rivers System in 1976. Portions of the river system are classified as Wild, Scenic, or Recreational based on their characteristics and use. Within the project area, the Middle Fork of the Flathead in the project area is designated as a Recreational River. Under the *WILD AND SCENIC RIVERS ACT*, Recreational Rivers are "those rivers or sections of rivers that are readily accessible by road or railroad, that may have some development along their shorelines, and that may have undergone some impoundment or diversion in the past" (**16 U.S.C. Sec 1273 (b)**).

The USFS Flathead National Forest is the lead agency responsible for the management of the Middle Fork of the Flathead Wild and Scenic River. However, management of the Wild and Scenic River was developed in conjunction with Glacier National Park and management responsibilities are shared with the NPS. The Management Corridor for the Middle Fork Recreational River segment, encompassing both public and private lands adjacent to the river, is

shown in **FIGURE 6** in Part IV. As shown on the figure, the proposed bridge would cross the Wild and Scenic River Corridor in the SW¼ of Section 14 in Township-29-North, Range-16-West, M.P.M. Lands from both Flathead National Forest and Glacier National Park are included in the Management Corridor at this location.

The general management direction for lands within the Recreational River Management Corridor is to provide optimum opportunity for public use and enjoyment of the Flathead Wild and Scenic River. This reach of the Middle Fork is typically used for recreational floating, fishing, sight seeing, and camping at dispersed sites along the riverbanks.

According to the District Ranger of the USFS's Hungry Horse Ranger District, five commercial rafting companies are permitted to operate on this section of the Middle Fork. Although no "hard" data on river use is maintained by the USFS, the District Ranger estimates that an average of one to four float parties use this section of river each day during the floating season. May through September is the typical season for floating on the Middle Fork.

b) Glacier National Park - Walton Area

The Walton area of Glacier National Park was originally developed in the early 1930's as an administrative site and to provide access for backcountry visitors. Walton is the only NPS developed area along the southern boundary of Glacier National Park between East Glacier and West Glacier. The Walton area presently contains a Ranger Station and other associated buildings and provides visitor access to backcountry trails (for hikers, cross-country skiers, snowshoers, and those riding horses) and picnicking. The Ole Creek Trail and the Ole Creek Horse Access Trail extend northwesterly along the Middle Fork from the facilities at Walton.

The Walton developed area is located in the "Middle Fork" geographic area of Glacier National Park. The 1999 General Management Plan for Glacier National Park shows the lands directly affected by this proposed bridge replacement lie entirely within a proposed "visitor services zone." **FIGURE 8** shows the proposed visitor services zone at Walton. The Park's General Management Plan indicates that the NPS will manage the area "to provide information and interpretive services." The Plan also states that development for the area "will include the highway, signs, trails, trailheads, waysides, sanitation facilities, parking lots, pullouts, picnic areas, exhibits, and staging areas."

The NPS intends to continue the operation of the Walton developed area to serve visitor trailhead, information and picnicking needs, and their own operational needs. As indicated in Part IV, the NPS is currently in the process of evaluating a proposal to develop a new parking area and accessible stock ramp adjacent to the east entrance to Walton Ranger Station.

c) Walton Ranger Station Historic District

The Walton Ranger Station was established in 1932 and other buildings within the historic district were generally built during the late 1930s and 1940s. The Walton Ranger Station Historic District (24FH397) consists of a series of buildings associated with the Walton Ranger Station including a residence, garage, woodshed, barn, and several other non-contributing structures.

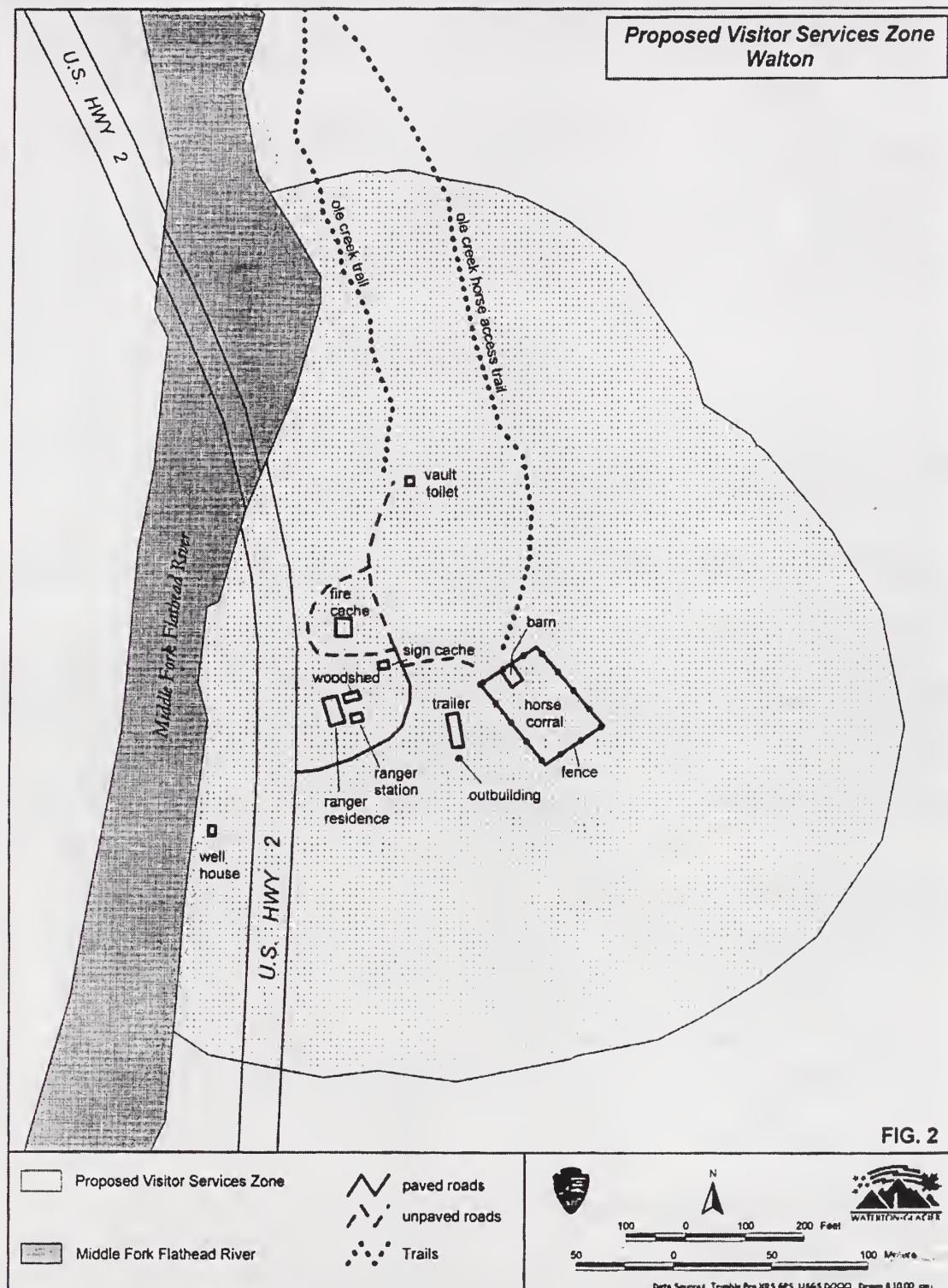


Figure 8
**Proposed Visitor
Services Zone - Walton**

FIGURE 9 shows the location of the historic district in relation to the existing highway and bridge. As the figure shows, the historic district is bounded by US 2 on the west and to the south by the entrance road to the ranger station.

The ranger station/residence is of log construction and has a stone and rubble masonry foundation. According to the NRHP nomination form prepared in 1984, the Walton Ranger Station "represents Park Service rustic design at its standard best." The fact that the ranger station presently serves the same function as it did when originally built adds to the significance of the historic district. Other significant buildings in the historic district are constructed of logs or wood pole framing.

C. Impacts on *Section 4(f)* Properties

This section describes the potential impacts of the Preferred Alternative on *Section 4(f)* properties in the vicinity of this project area. This alternative would construct a new bridge just upstream from the existing structure and rebuild the approaches to the new Middle Fork crossing.

1. Impacts to the Middle Fork of the Flathead Wild and Scenic River

Within the Wild and Scenic River Corridor, approximately 1.09 hectares (2.71 acres) of easement area from the Flathead National Forest and about 1.24 hectares (3.07 acres) of easement area from Glacier National Park must be acquired for the proposed bridge construction project. This proposed project would increase the total easement area for US 2 within the Wild and Scenic River Corridor (on the NPS side of the river) by 0.39 ha (0.97 acres). **FIGURES 5 and 6** in Part IV show USFS and NPS lands within the Wild and Scenic River Management Corridor that would be affected by the proposed bridge replacement.

Lands within the Wild and Scenic River Corridor on both sides of the Middle Fork would be disturbed to construct the proposed bridge and its approaches. The Preferred Alternative would affect the Middle Fork of the Flathead Wild and Scenic River by constructing a bridge within the stream and on its banks. Specific activities to be undertaken include placing a temporary work bridge in the river; constructing piers for the new bridge in river; installing the substructure, superstructure, and deck for the new bridge; building abutments and new approaches to the bridge; building a short section of road to access the dispersed recreation area along the river; and removing the old structure at the completion of construction of the new bridge.

MDT's road designers have prepared plans showing the estimated the extent of cut and fill areas (construction limits) for the proposed highway and bridge construction. Approximately 0.95 ha (2.36 acres) are within the construction limits on the USFS side of the river and 0.52 ha (1.29 acres) are within the construction limits on the NPS side. It should be noted that the majority of this construction disturbance area consists of lands disturbed by previous road and bridge construction and utility installations.

The impact of these activities are considered minor since a structure already exists at this location and the existing bridge would be removed at the completion of construction. The natural

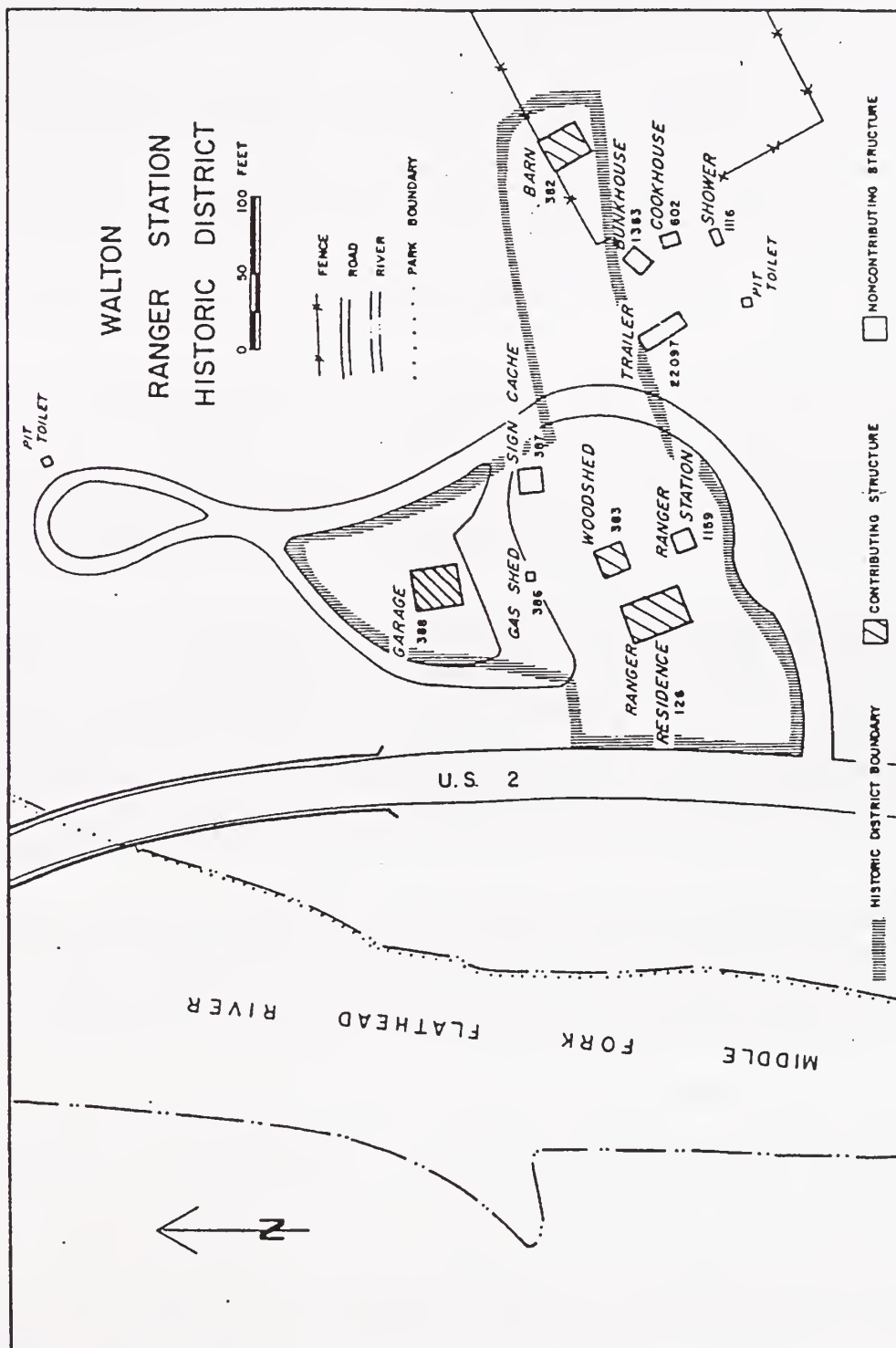


Figure 9
Walton Ranger Station Historic District

characteristics of the river and its recreational use would not be substantially changed by the implementation of this project. The Preferred Alternative would not alter this river segment's ability to meet the eligibility and classification criteria listed in the *WILD AND SCENIC RIVER ACT*.

Like the existing bridge and highway, the new facility would be visible from the Middle Fork Recreational River Corridor. Some vegetation adjacent to the existing highway and bridge at the crossing would be cleared for construction. Construction of the proposed access road to the dispersed recreation site on USFS land would require a substantial amount of work along the west bank of the Middle Fork near the north end of the new bridge. The fill slope associated with the access road's foundation, a gabion retaining wall, and riprap placed at each end of the bridge would be apparent to floaters on the Middle Fork.

Recreational use of the Middle Fork of the Flathead Wild and Scenic River in the immediate vicinity of the proposed bridge may be adversely affected during its construction period. The work bridge needed to construct the new bridge would have limited headroom for floaters passing under the structure. MDT has proposed maintaining an opening in the work bridge near the center of the channel as one means of mitigating impacts of this project on commercial rafting outfitters and other floaters that use this reach of river.

MDT proposes to use the dispersed USFS recreation site and river access as a staging area for construction activities. Recreational and floating opportunities on the river could be reduced if the storage of equipment or construction materials restricts access to the river at the USFS site. Since construction activities would occur above the river and its banks, concerns also exist for the safety of floaters and other river users passing beneath the new bridge. MDT and the USFS would install signs at upstream put-in locations and upstream of the work site warning floaters of the work area at the bridge near Essex.

About 0.22 ha (0.54 acres) of land within Glacier National Park now authorized for US 2 would no longer be needed for the proposed project. This land would be graded, revegetated and restored to a natural condition by MDT. Restoring land formally occupied by the highway to other uses would benefit park resources including visitors to the Park and Wild and Scenic River.

As indicated in Part IV, the USFS Flathead National Forest coordinated with the NPS and prepared an analysis and determination of this proposed project's impacts during September 1999 (see **APPENDIX B**). The 1999 analysis concluded that the proposed bridge replacement would not have any long-term significant effects on the free-flowing status or on the outstanding and remarkable values of the Middle Fork of the Flathead Wild and Scenic River. Please note that a new Section 7 Determination for this proposed project is forthcoming from the USFS. MDT does not anticipate that the USFS would substantially change their overall conclusions about this project's effects on the Middle Fork of the Flathead Wild and Scenic River in the new Section 7 Determination.

2. Impacts to Glacier National Park (Walton Area)

The Preferred Alternative would require the NPS to issue a Highway Easement Deed for 1.24 ha

(3.07 acres) of land within Glacier National Park in the vicinity of Walton. The Highway Easement Deed would not grant permanent interest in park lands. The Highway Easement Deed for the proposed project would include a major portion of the existing US 2 and additional land between the existing highway and the Middle Fork to allow for the construction of the new bridge and its easterly approach. About 0.22 ha (0.54) acres of park land now authorized for US 2 would not be required for this proposed project and would be graded, revegetated and restored to a natural condition. The new foundation and pavement surfacing for the approach to the bridge, one of the bridge abutments and associated riprap would be constructed within the area covered by a Highway Easement Deed that would be applied for if this project were approved.

As indicated previously, about 0.52 ha (1.29 acres) of Glacier National Park lands are within the identified construction limits for the proposed highway and bridge. The majority of the construction disturbance would occur over previously disturbed lands within Glacier National Park. The only "new" disturbance on NPS land would occur on about 0.13 ha (0.33 acres) immediately southwest of the existing bridge between the road and the Middle Fork.

According to the *Environmental Assessment and Assessment of Effect for the Walton Area Plan* prepared by the NPS in September 2000, the general habitat type of the park land that would be affected by the Preferred Alternative is spruce/queencup beadlily forest. The NPS Environmental Assessment notes that area along US 2 near the entrance to the Walton Ranger Station is currently dominated by herbaceous, exotic species like timothy and spotted knapweed. Young cottonwood trees and some grasses dominate the riparian zone of the Middle Fork of the Flathead River in the project area. The banks of the Middle Fork near the existing bridge are extremely rocky and do not support dense growths of vegetation. Few large trees exist on the bank area where the new south end of the bridge and highway approach would be built. In general, the vegetation in this area has only limited habitat value and would not represent a significant loss to the small mammals, birds, and other wildlife in the project area.

The Preferred Alternative would not affect access to or recreational or administrative uses at the Walton developed area. MDT would maintain public access to the NPS facilities at Walton throughout the duration of construction. However, some temporary delays to highway travel through this portion of the Park and disruptions in access to Walton would likely occur during the construction and surfacing of the east approach to the new bridge.

Noise due to bridge and highway construction activities would produce localized and short-term impacts for Park visitors, users of the Ole Creek Trails, and for NPS employees at Walton.

As indicated in Part IV, the NPS has tentative plans to build new trailhead and parking improvements adjacent to the Walton Ranger Station. The environmental assessment prepared by the NPS identifies the planned development area at Walton as a potential staging area for the contractor building the new bridge. However, because the NPS's project at Walton is not likely to be built until after MDT's proposed bridge is completed, the use of land at Walton by MDT's contractor was dropped from consideration.

3. Impacts to the Walton Ranger Station Historic District

Glacier National Park's Walton Ranger Station Historic District is adjacent to the southeasterly side of this proposed project. However, the construction limits for the proposed project adjacent to the historic district would remain within US 2's current authorized area. The proposed alignment for US 2 in the area would be shifted away from the historic district. The proposed shift in the location of the new bridge and its easterly approach would move traffic and related noise slightly farther away from the Walton Ranger Station Historic District. The grade of the new road would be similar to that of the existing highway and construction limits would not encroach beyond the existing authorized area for US 2. Access to the Walton area would continue from the existing highway throughout the duration of the proposed bridge construction.

D. "Nationwide" Programmatic *Section 4(f)* Evaluations

Separate "Nationwide" Programmatic *Section 4(f)* Evaluation forms were prepared for this proposed project's involvement with the Middle Fork of the Flathead Wild and Scenic River, Glacier National Park (Walton Area), and the Walton Ranger Station Historic District, a site listed on the NRHP. The completed "Nationwide" Programmatic *Section 4(f)* Evaluation forms and other supporting information are contained in **APPENDIX D**. Copies of the FHWA Programmatic Memorandum of Agreements for minor involvements with public recreation sites and historic sites can also be found in the same appendix.

VI. Coordination with Others

VI. COORDINATION WITH OTHERS

This Part summarizes efforts undertaken by MDT to communicate with the agencies and the public about the proposed bridge replacement project. The specific objectives of the public involvement activities for this proposed project are to:

- ☐ identify and include people, groups, and agencies that may be affected;
- ☐ provide opportunities for interested parties to express their views, ideas, and concerns about the project;
- ☐ ensure that concise and understandable project information is provided to interested parties; and
- ☐ make it apparent to interested parties that their opinions and ideas have been considered during the development of the project.

A. Agency Coordination

1. Cooperating Agencies

Requests to be Cooperating Agencies are typically issued to agencies with jurisdiction or special expertise early in the project under the provisions of 23 CFR 771.111(d). The NPS-Glacier National Park and the USFS Flathead National Forest have jurisdiction over this proposed project by allowing US 2 to be developed across public lands. The proposed project would also occur within the Middle Fork of the Flathead Recreational River and its associated Management Corridor. The USFS and the NPS manage the Middle Fork of the Flathead River as a recreational river within the Wild and Scenic River system. Actions and decisions regarding the development of this project on USFS lands are dictated by procedures outlined in the 1993 *MDT/FHWA/USFS Memorandum of Understanding for State Highways Over National Forest System Lands* (MOU).

Both the NPS and USFS have served as Cooperating Agencies for the development of MDT's original bridge rehabilitation project, known as F-1-2 (56) 180, and have been kept informed of actions relating to the proposed replacement of the Middle Fork Bridge. NPS and USFS representatives were present at a field review for this proposed bridge replacement project held August 1, 1996 and were provided with copies of a Preliminary Field Review Report issued by MDT on August 12, 1996.

In March, 1997, MDT issued letters to the NPS and USFS asking these agencies to reaffirm their interest in continuing to serve as Cooperating Agencies for the proposed project. Letters from the NPS and USFS received in response to this request for continued service as Cooperating Agencies are in **APPENDIX B**. MDT also issued a request to the U.S. Fish and Wildlife Service (USFWS) to become a Cooperating Agency for this project due to the presence of threatened or endangered species and their habitat in the project area. All three agencies have expressed their willingness to participate in the development of this proposed bridge replacement project.

The NPS, USFS, USFWS, and the Montana Department of Fish, Wildlife & Parks were provided with "rough draft" versions of this Environmental Assessment for review and comment. Relevant comments and necessary changes submitted by these agencies have been incorporated into the text of this document.

2. Agencies Consulted

The following agencies and parties were consulted during the development of this Environmental Assessment:

- U.S. Department of the Interior National Park Service, Glacier National Park
- U.S. Department of Agriculture, Forest Service, Flathead National Forest
- U.S. Fish and Wildlife Service
- Federal Highway Administration (Montana Division Office)
- U.S. Department of the Army, Corps of Engineers
- Montana Department of Fish, Wildlife & Parks (Parks Division)
- Montana State Historic Preservation Office
- Montana Department of Environmental Quality (Permitting and Compliance Division)
- Natural Heritage Program, Montana State Library
- Flathead Regional Development Office
- Salish-Kootenai Tribal Preservation Office

B. Public Involvement

1. Public Notifications and News Releases

MDT's Bridge Bureau issued a News Release announcing that the scope of the project was changed from rehabilitation to replacement on January 15, 1997. The news release was made available to area newspapers and radio and television stations.

A second news release and an advertisement of the Public Information Meeting were issued on April 1, 1997. The News Release was used to advertise the purpose, time, date, and location of the open house meeting. The news release was published in newspapers from Whitefish, Kalispell, Columbia Falls, and Browning. Public service announcements were provided to radio and television stations in Kalispell, Whitefish, and Shelby.

2. Public Meetings Held on the Proposed Project

Public Information Meeting. A public information meeting was held on April 10, 1997 at the Izaak Walton Inn at Essex. The "open-house" information meeting was used to advise the public that the proposed scope of work for the project has changed from bridge rehabilitation to bridge replacement in the vicinity of the existing crossing. The meeting was also used to solicit comments on issues or concerns that should be considered in the development of the bridge replacement project.

The meeting convened at 6:00 p.m. with one-on-one discussions of the proposed project with agency representatives and several members of the public. Short presentations about the project were made at 6:30 and 7:00 p.m. The presentations included a description of the purpose and need for the proposed project, an outline of the proposed changes in the scope of work for the project, and a summary of known issues pertinent to the proposed bridge replacement at this location. The presentations were followed by a question and answer session. The public was encouraged to make comments on project issues through one-on-one contacts with agency representatives, by submitting written comments, or by recording comments on a tape recorder provided at the meeting. The meeting concluded at 8:30 p.m.

The following questions or concerns were voiced at the April 1997 public meeting:

- ☐ A local resident expressed concern that shifting the new road to the west will require a large amount of excavation on the northwest side of the new bridge which could affect a residential subdivision in the area. MDT road and bridge designers indicated that they were aware of the need for excavating this area and did not expect the resulting road cut for the upstream bridge alignment to affect any residences in the subdivision.
- ☐ Two individuals indicated that the existing curve on the east end of the present bridge is sharp and difficult to negotiate during certain weather and road conditions. One individual thought MDT's proposed upstream bridge alignment could perpetuate this condition. The other felt MDT's proposal would make the curve much safer than the present alignment. MDT's bridge designers indicated that the new bridge would be on a tangent (straight) alignment. The curve at the east end of the new bridge would be designed to meet geometric design standards for the selected design speed.
- ☐ A concerned member of the audience asked what will happen if the bridge washes out in the heavy expected runoff this year. Jim Weaver, Missoula District Administrator, stated that such a situation is impossible to predict at this time. If the situation occurred, this crossing would likely not be the only one in northwest Montana that was affected. The District Administrator said MDT would have to prioritize their efforts to get the transportation network functioning once again and that Highway 2 is an important route in the state.
- ☐ Another individual asked how far along MDT is in the design of the new bridge. One of MDT's bridge engineers stated that design work had not yet begun since mapping and surveying in the area was not available. He indicated that the new bridge would be about the same height as the existing structure and would not have a substantially different appearance. The same individual expressed some concern over the cost of building a new bridge and asked why the existing bridge deteriorated so quickly. A bridge engineer replied that the existing structure was built with lightweight concrete and that the bridge has been used for about two-thirds of its design life. The engineer explained that the cost of a new bridge was high but a new bridge would be a good investment and would not need attention for many years into the future.

Other Project Meetings. The District Administrator of MDT's Missoula District attended the annual meeting of the Parma Addition Homeowners Association on August 2, 1997. The MDT representative was present to discuss and explain the proposed project. Those attending the meeting were primarily interested in the impact of the proposed project on a neighborhood well house. The well house is located in an area that could have been affected by a road cut initially planned near the northwest end of the proposed bridge.

3. Public Notice and Availability of the Initial EA

The Environmental Assessment (EA) and "Nationwide" Programmatic *Section 4(f)* Evaluation was approved for public availability by the FHWA on March 14, 2000. The document was then distributed to local, state, and federal agencies and made available to interested members of the public prior to the end of March. As a result of this distribution, MDT received a request from the U.S. Department of the Interior for additional copies of the document for filing and administrative purposes. Additionally, one letter (from Doug Bonham) with comments on the EA was received by MDT on April 3, 2000.

Advertisements announcing the availability of the EA and "Nationwide" Programmatic *Section 4(f)* Evaluation and a public meeting to discuss the environmental documents were published in area newspapers between April 5 and April 13, 2000. The advertisements were published in the following newspapers: *Cut Bank Pioneer Press*; the *Whitefish Pilot*; the *Hungry Horse News*; *The Glacier-Reporter* (Browning); and the *Daily Interlake* (Kalispell). The announcement was published on two occasions (April 6 and April 13) in the *Hungry Horse News* and the *Daily Interlake*. A copy of the advertisement follows this page.

Comments on the project were requested in the advertisement. On April 20, 2000, MDT Environmental Services received a letter from Sharlon L. Willows, C.L.A., Coordinator for the Coalition for Canyon Preservation, Inc. (CCP) with comments on the Environmental Assessment and *4(f)* Evaluation.

Comments received in letters from Doug Bonham and Sharlon L. Willows and responses to their substantive comments can be found in **APPENDIX F**.

4. Public Open House Meeting on the Initial EA

MDT held an open-house format public meeting to receive comments on the EA and the proposed bridge replacement on April 20, 2000. The public meeting was held at the Izaak Walton Inn between 3:30 p.m. and 6:30 p.m. Four members of the public and numerous MDT staff attended the meeting. One-on-one discussions between the public and MDT staff about the project and related matters occurred throughout the open house meeting.

Comments Heard at the Meeting. The public was encouraged to make comments about the EA or other project issues through one-on-one contacts with agency representatives, by submitting written comments, or by recording comments on a tape recorder provided at the meeting.

The following questions or comments were heard at the April 2000 public meeting:

Dwayne Phippen, owner of a seasonal home in the Parma Subdivision, expressed concern over noise levels during construction. He believes the noise associated with construction activities would be highly disruptive for local residents, particularly since the new bridge would be located closer to homes in the subdivision. An MDT bridge engineer explained to Mr. Phippen that constructing the bridge would require the use of heavy equipment (like pile drivers) and short-term noise impacts would be unavoidable. It is also likely that in-stream construction of bridge piers may be restricted between July 1 and September 30 to minimize potential impacts to bull trout. This may offer some relief from construction noise for seasonal residents, however, work would likely continue in dry areas of the riverbed and on its banks. Restrictions on the timing of work in the channel would be specified as conditions of water-related construction permits obtained by MDT.

Dick Crockford, a permanent resident of the Essex area, offered no specific comments on the EA and expressed his general support for the project. Mr. Crockford described the sometimes hazardous winter driving conditions on the existing bridge and provided information about past bridges across the Middle Fork in the area. He believes a wider and straighter bridge will improve safety at this location.

Joyce Lapp and Lisa Jamison of the National Park Service used the meeting as an opportunity to review the EA and discuss construction sequencing with an MDT bridge engineer and other MDT staff. The NPS employees will be involved in the revegetation of lands within Glacier National Park and the Flathead National Forest disturbed by construction of the proposed bridge.

5. Other Public Comments Received Concerning the Initial EA

On April 26, 2000, Dan Norderud of Robert Peccia & Associates received a telephone call from Travis Scott of Wilderness River Outfitters. Mr. Scott had no specific comments regarding the EA. He pointed out that as a rafting outfitter, his firm frequently uses the dispersed recreation site along the river near Essex as a take-out point. He expressed concern over not having use of the area during construction of the new bridge since river access points near Essex are scarce.

Mr. Norderud indicated that MDT and the U.S. Forest Service were aware of the frequent use of the area by rafting outfitters and the hardship that would be caused by closing the dispersed recreation site during construction of the new bridge. He indicated that measures have been included to ensure that floating can continue through the bridge site and that signing would be placed upstream to advise river users of the work area. No other reasonable locations exist in the area for staging construction activities for the proposed bridge.

MDT Environmental Services received another letter from Sharlon L. Willows, C.L.A., Coordinator for the Coalition for Canyon Preservation, Inc. (CCP) dated June 13, 2000 with comments on the Visual Impact Assessment (VIA), Wild and Scenic River effects, and the 1993 Memorandum of Understanding on Procedures Related to State Highways Across National Forest System Lands. Comments made in Ms. Willows' June 13, 2000 letter and MDT's responses can be found in **APPENDIX F**.

6. Written Agency Comments Received Concerning the Initial EA

Written comments on aspects of the initial EA were submitted on October 12, 2000 to Merlin Voegele of the FHWA's Montana Division Office by Denis Davis on behalf of Suzanne Lewis, Superintendent of Glacier National Park. Comments on the initial Environmental Assessment and Nationwide *Section 4(f)* Evaluations were also submitted to Janice W. Brown, FHWA's Montana Division Administrator by Willie R. Taylor, Director of the USDO's Office of Environmental Policy and Compliance in a letter dated October 24, 2000. These letters, along with responses to substantive comments can be found in **APPENDIX G**.

Preliminary versions of the Revised Environmental Assessment/*Section 4(f)* Evaluation were provided to the USFS and NPS-Glacier National Park for review in January 2001. Glacier National Park Superintendent Suzanne Lewis (by Denis Davis) submitted a letter with comments on the document and suggested text changes to FHWA and MDT on February 21, 2001. The NPS letter also provided information about the process that must be followed to request and obtain a Highway Easement Deed for US 2. A letter from the District Ranger of the USFS Hungry Horse Glacier View Ranger District with comments pertinent to the evaluation of potential effects on the Middle Fork of the Flathead Wild and Scenic River was also submitted to MDT on February 23, 2001. Comments from both agencies have been considered and incorporated into this Revised Environmental Assessment/*Section 4(f)* Evaluation.

7. Planned Public Involvement Activities

A Notice of Availability of the Revised Environmental Assessment/*Section 4(f)* Evaluation will be mailed to all parties on the project mailing list and advertised in local newspapers following FHWA's approval of the document. Written comments will be received on the Revised Environmental Assessment document for thirty (30) days following the publication of the Notice of Availability. After the close of the official comment period, comments received on the document will be reviewed and the text of the Revised Environmental Assessment/*Section 4(f)* Evaluation will be modified as required.

If no significant impacts are identified, MDT will submit the Revised Environmental Assessment and *Section 4(f)* Evaluation to FHWA and request that the agency make a Finding of No Significant Impact (FONSI). The FONSI will then be attached to the Environmental Assessment. If significant impacts are found, then an Environmental Impact Statement must be prepared for the proposed action.

C. Distribution List for Document

The following agencies, groups, and individuals are being sent a copy of this Environmental Assessment:

U.S. DEPARTMENT OF THE INTERIOR
U.S. Fish & Wildlife Service
Dale Harms, State Supervisor
301 South Park, Box 10023
Helena, MT 59626
Attn: Scott Jackson

U.S. DEPARTMENT OF THE INTERIOR
National Park Service
Glacier National Park
P.O. Box 128
West Glacier, MT 59936
Attn: Jack Gordon/Fred Babb

U.S. DEPARTMENT OF THE INTERIOR
National Park Service
Glacier National Park
P.O. Box 128
West Glacier, MT 59936
Attn: Mary Riddle

U.S. DEPARTMENT OF THE INTERIOR
National Park Service
Intermountain Regional Office
12795 Alameda Pkwy
Denver, CO 80225
Attn: Chris Turk

U.S. DEPARTMENT OF THE INTERIOR
Office of the Secretary
Office of Environmental Policy and Compliance
MS 2340 MIB
1849C Street NW
Washington, D.C. 20240
Attn: Willie R. Taylor, Director

U.S.D.A. FOREST SERVICE
District Ranger
Glacier View/Hungry Horse Ranger District
P.O. Box 190340
Hungry Horse, MT 59919-0340
Attn: Fred Flint

U.S.D.A. FOREST SERVICE
Flathead National Forest
Cathy Barbouletos, Forest Supervisor
1935 Third Avenue East
Kalispell, MT 59901

U.S.D.A FOREST SERVICE
Region 1
200 East Broadway
Missoula, MT

U.S. DEPARTMENT OF TRANSPORTATION
Federal Highway Administration
Montana Division Office
2880 Skyway Drive
Helena, MT 59602

MONTANA DEPARTMENT OF
ENVIRONMENTAL QUALITY
P.O. Box 200901
Helena, Montana 59620-0901
Attn: Permitting and Compliance Division

STATE LIBRARY
Collection Management Librarian
1515 East Sixth Avenue
Helena, MT 59620-1800

ENVIRONMENTAL QUALITY COUNCIL
Office of the Director
Capitol Post Office Box 215
Helena, MT 59620

MONTANA DEPARTMENT OF FISH, WILDLIFE
& PARKS
Region One
490 North Meridian
Kalispell, MT 59901
Attn: Regional Supervisor

FLATHEAD COUNTY COMMISSIONERS
Flathead County Courthouse
Kalispell, MT 59901

FLATHEAD REGIONAL DEVELOPMENT
OFFICE
735 5th Avenue East - Room 414
Kalispell, MT 59901

FLATHEAD COUNTY PLANNING BOARD
724 5th Avenue East
Kalispell, MT 59901

GLACIER COUNTY COMMISSIONERS
Glacier County Courthouse
Cut Bank, MT 59427

Dwayne and Mary Phippen
134 2nd Avenue SW
Cut Bank, MT 59427

Doug and Laurie Bonham
3101 168th Street SE
Bothell, WA 98012

Brad Rutherford
Box 1414
Cut Bank, MT 59427

Don Martin
Box 742
Cut Bank, MT 59427

Carl Rehmer
Box 1321
Cut Bank, MT 59427

Dell and Noralee Dillon
Box 666
Essex, MT 59916

Rex and Anita Neil
Box 654
Essex, MT 59916

Darby O'Brien
Box 655
Essex, MT 59916

Glacier Raft
P.O. Box 218
West Glacier, MT 59936

Northwest Voyagers/Wild River Adventures
Box 272
West Glacier, MT 59936

Wilderness River Expeditions
Box 871
Salmon, ID 83467

Great Northern Raft Co.
Box 278
West Glacier, MT 59936

Montana Raft Company
Box 535
West Glacier, MT 59936

Sharlon L. Willows, C.L.A.
Coalition for Canyon Preservation, Inc.
P.O. Box 422
Hungry Horse, MT 59919-0422

D. List of Agencies With Jurisdiction and/or Permits Required

The following agencies have permit requirements applicable to this proposed action:

- U.S. Department of Agriculture, Forest Service, Flathead National Forest - Easement for new bridge and highway construction across National Forest Lands.
- U.S. Department of the Interior, National Park Service, Glacier National Park - Highway Easement Deed for new highway and bridge construction across National Park land.
- U.S. Department of the Army, Corps of Engineers (Regulatory Office) -- Section 404 Permit for placing fill material associated with bridge and pier construction in the Middle Fork of the Flathead River, wetlands, or other "Waters of the U.S."
- Montana Department of Fish, Wildlife & Parks - 124SPA Permit as required under the *Montana Stream Protection Act*.
- Montana Department of Environmental Quality, Permitting and Compliance Division - Section 402/Montana Pollutant Discharge Elimination System Permit/*318 Authorization*

E. List of Other Agencies, Persons, or Groups Contacted or Have Contributed Information

The agencies and individuals below were contacted for information useful to the preparation of this Environmental Assessment. Pertinent correspondence from some of these individuals has been included in **APPENDIX B**.

- Robert E. McInerney, Montana Program Manager (retired), Department of the Army Corps of Engineers
- Eric H. Mulcahy, AICP, Senior Planner, Flathead Regional Development Office
- Kevin Shelley/Scott Jackson, U.S. Fish and Wildlife Service
- Scott Rumsey, Montana Department of Fish, Wildlife & Parks (Kalispell)
- John Ashley, Contract Biologist, West Glacier
- Bob Jordan, Owner/Operator, Wild River Adventures
- Darwon Stoneman, Glacier Raft Company
- John Gray, Glacier Wilderness Guides/Montana Raft Company
- Joe (last name unknown), Wilderness River Expeditions

Appendices

Appendix A: List of Preparers

The following parties are responsible for the preparation and content of this document:

Joel M. Marshik, P.E.
Environmental Services Manager
Montana Department of Transportation
P.O. Box 201001
Helena, MT 59620-1001

Janice W. Brown, Division Administrator
Montana Division Office
Federal Highway Administration
2880 Skyway Drive
Helena, MT 59602

The following consultants assisted the Montana Department of Transportation coordinate, develop supporting information, and write this document:

Robert Peccia & Associates, Inc.

Consulting Civil Engineers, Planners and Designers
825 Custer Avenue
P.O. Box 5653
Helena, Montana 59604

OEA Research, Inc.

Ecological Services Consultants
635 North Jackson
P.O. Box 1209
Helena, Montana 59624

Ginger Thomas Consulting

Fisheries and Biological Resources Consultant
502 Livingston Avenue
Missoula, Montana 59801

Ethnoscience

Cultural Resource Consultant
711 Rimrock
Billings, Montana 59102

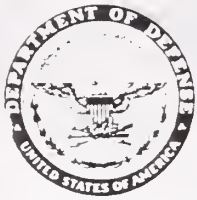
Fischer & Associates, Inc.

Landscape Architects and Planners
2815 Montana Avenue
Billings, Montana 59101

Western EcoSystems Technology, Inc.

2003 Central Ave.
Cheyenne, Wyoming 82001

Appendix B: Correspondence Pertinent to Project



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, OMAHA DISTRICT
215 NORTH 17TH STREET
OMAHA, NEBRASKA 68102-4978

July 8, 1997

RECEIVED

JUL - 9 1997

**ROBERT PECCIA
& ASSOCIATES**

U.S. Army Corps of Engineers
Federal Bldg 301 S Park Drawer 10014
Helena, MT 59626
(406)441-1375

Daniel M. Norderud
Robert Peccia & Associates, Inc.
P.O. Box 5653 825 Custer
Helena, Montana 59604

Dear Mr. Norderud:

Reference is made to your letter concerning the proposed bridge replacement across the Middle Fork of the Flathead River near Essex on U.S. Highway 2 in Flathead County, Montana.

Under the authority of Section 404 of the Clean Water Act, Department of the Army permits are required for the excavation and placement of dredged or fill material below the ordinary high water mark of our nation's rivers, streams, lakes or in wetlands.

If there is no discharge of fill material such as dirt, rock, gravel or cement, either temporarily or permanently in a wetland, or below the ordinary high water mark of the Middle Fork of the Flathead River then no Department of the Army permit would be required for this project.

If you have any questions, please call (406) 441-1375.

Sincerely,

Robert E. McInerney
Montana Program Manager

Flathead Regional Development Office

723 5th Avenue East - Room 414
Kalispell, Montana 59901

Phone: (406) 758-5980

Fax: (406) 758-5781

July 9, 1997

Daniel M. Norderud, Environmental Planner
Robert Peccia & Associates
P.O. Box 5653
Helena MT, 59604

RECEIVED

JUL 11 1997

**ROBERT PECCIA
& ASSOCIATES**

RE: Middle Fork- Flathead River Bridge in Essex

Dear Mr. Norderud:

Thank you for the opportunity to comment on the bridge reconstruction. The bridge over the Middle Fork of the Flathead River in Essex is shown on the Flood Insurance Rate Map (FIRM) index as panel # 1575C.

Due to the low population and limited amount of improved property within this area of the Canyon, FIRM panel # 1575C was never studied or created. For areas not mapped, like Essex, the Flathead County Floodplain and Floodway Management Regulation does not require a Floodplain Development Permit.

I have also reviewed the County's zoning regulations for the Essex area of the Canyon. The Canyon Area Land Use Regulatory System does not require any landuse review for this proposed bridge reconstruction.

If you have not done so already, you might contact the Flathead Conservation District regarding their Stream Bank Protection Act and the 310 Permit. Again thanks for the heads up and please contact me at (406)758-5980 if you have any questions.

Sincerely



Eric H. Mulcahy, AICP
Senior Planner

..letters/1997/essexbr

Providing Community Planning Assistance To:

• Flathead County • City of Columbia Falls • City of Kalispell • City of Whitefish •



WILD RIVER ADVENTURES

P.O. Box 272 • West Glacier, Montana • 59936

Toll-Free 1-800-700-7056 • Phone (406) 387-9453 • Fax (406) 387-9454

e-mail: wilddriver@riverwild.com • Web site: www.riverwild.com

RECEIVED

Daniel M Norderud, AICP
Robert Peccia & Associates, Inc.
P. O. Box 5653
Helena, MT. 59604

January 31, 1998

FEB - 9 1998

**ROBERT PECCIA
& ASSOCIATES**

Dear Daniel,

This letter is in response to your letter of September 12, 1997. I hope this response can still be of some help with your study of the Middle Fork-Flathead River Bridge project.

Our company ran a total of seven trips on this section of the river, with an average group size of six during the 1997 season. We anticipate an increase in the number of trips during the upcoming season. We typically start our 3 day trips from Bear Creek during the month of June, and from Essex in July and August, water flows permitting. Last year we put in at the Essex bridge a total of four times, and have never taken out at this site. Typical charge per floater for floating this section of river is \$100.00 per day. To my knowledge there has been a slight increase in traffic on this section of the river during the last 5 years.

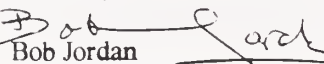
Closing the Essex bridge put-in site would not affect our business if an alternative river access site in the vicinity was developed. We would need to have a site where a van could back down a trailer with boats and gear. If there were no alternative sites developed, there would be a definite impact on our business, especially for the July and August trips which traditionally is our busiest season. June trips could be started at Bear Creek as long as river flows permitted. This has not been possible, even in high water years in July and August.

We only need a temporary parking space to unload our gear. We do not leave vehicles at the Essex site. Currently I do not know of any private sites which could be used as an alternative. Extended closure of the bridge would have a definite impact on our business, as we have already sold some 3 day trips and expect to sell more during the course of the season.

We are very flexible, and as long as some alternative site can be found in the vicinity of the bridge, we would not have any problems. Otherwise it will definitely have a logistic and economic impact on our business.

Thank You for your consideration and please keep us apprised of any plans in regards to this project.

Sincerely Yours,


Bob Jordan
Owner/Operator



November 24, 1997

Daniel M. Norderud, AICP
Project Manager
Robert Peccia & Associates, Inc.
PO Box 5653
Helena, MT 59604

RECEIVED

NOV 26 1997

Re: Middle Fork-Flathead River Bridge
MDT Project BR 1-2(85) 180

**ROBERT PECCIA
& ASSOCIATES**

Dear Daniel,

In response to your questions concerning the Middle Fork Bridge:

1. Float trips operated on this section of the River: June--average of 2 float trips per week and one of those taking out at Essex Bridge.

July--average of 6 trips per week and one of these taking out at Essex Bridge.

August--average of 5 trips per week and, depending on water levels, all 5 might put in at the Essex Bridge.

On average, there are about 8 people per trip.

2. Typical charge for trips on this section would be about \$150.00 per person per day. The number of floaters has increased slightly in the last 5 years.

3. Temporary closures of the put-in/take-out would adversely affect our business. We would have to use alternate put-ins or take-outs at Bear Creek or Paola Creek which might lengthen or shorten the trips. We could probably live with this if the end result was a better put-in/take-out facility.

4. We do not usually leave more than one small bus and trailer for more than a few hours. The private floaters would leave more vehicles, so my best guess would be parking for 10-15 vehicles would be required.

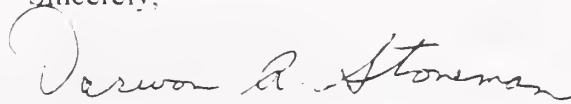
5. It might be possible to make a temporary put-in on the Glacier National Park side on the downstream side of the existing bridge. Extended closure would not be acceptable to us.

6. If you could leave room to back-in a van or small bus and trailer, we could be in and out quickly.

7. Just the private users.

We understand that you must deal with rebuilding the bridge and ask that you understand that we do use the Essex Bridge put-in/take-out. so please try to keep the access open. Also, please do consider that this would be a good opportunity to create a good long-term river access.

Sincerely,

A handwritten signature in cursive script that reads "Darwon A. Stoneman". The signature is written in dark ink and is positioned below the word "Sincerely,".

Darwon Stoneman



GLACIER WILDERNESS GUIDES
MONTANA RAFT COMPANY

Daniel M. Norderud
Robert Peccia & Associates
P.O. Box 5653
Helena, Mt. 59604

RECEIVED

SEP 18 1997

ROBERT PECCIA
& ASSOCIATES

Dear Daniel,

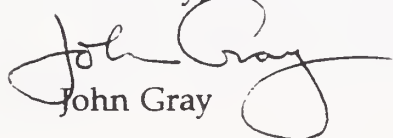
Sept. 15, 1997

The following is the best answers I can give to your questions.

- 1.) We run overnite trips on this portion of the river every Saturday, Monday, Wednesday and Friday, plus we run custom trips that could leave on any given day. We run these trips starting in late May till after Labor Day. A typical trip would have 10 to 12 people on it. Early in the year we can start the trip at Bear Creek with the customers but we almost always put our gear boat in at the Essex bridge. We do not use this site as a take out. Across the river at the Walton Ranger station in Glacier National Park is a picnic area that would work as a river access site.
- 2.) The cost for trips on this section of the river runs about \$125/day for adults and \$100 for children. The number of floaters has definitely increased over the last 5 years.
- 3.) Temporary closures of this river access would definitely have a negative impact on my business. I would not be able to offer some of the trips that I now offer without a river access site at Essex.
- 4.) We do not park our vehicles at the site so we don't require much parking space.
- 5.) The picnic area in Glacier National Park across the river and downstream of the present site is the best alternative. I would be against extended closures of this site unless an alternate site was available..
- 6.) As long as there was another site available and delays due to construction were kept to a minimum any adverse effects to my business would be minimized.
- 7.) There are a lot of people who use the area above the bridge as a campground. Most of the campers are from the eastside. Many private floaters and fishermen also use this site.

I hope this helps answer your questions, please keep me informed on what is happening with this project and if I can help you in anyway with your planning please let me know.

Sincerely,


John Gray

Box 535 • West Glacier, MT 59936 • 800-521 RAFT or 406-387-5555

FAX 406-387-5656 • E-MAIL: glguides@cyberport.net

<http://www.travelfile.com/get?glguides>





ROBERT
PECCIA
& ASSOCIATES

Civil Transportation
& Environmental
Engineers

September 12, 1997

Wilderness River Expeditions
Box 871
Salmon, ID 83467

Subject: Middle Fork-Flathead River Bridge
MDT Project BR 1-2(85) 180

RECEIVED

OCT 16 1997

Dear River Outfitter:

ROBERT PECCIA

The Montana Department of Transportation (MDT) is planning to replace the existing U.S. Highway 2 bridge across the Middle Fork of the Flathead River near Essex. Our firm is helping MDT prepare the necessary environmental documents for this proposed project. MDT is developing this project in cooperation with the National Park Service-Glacier National Park, the U.S. Fish and Wildlife Service, and the U.S.D.A. Forest Service-Flathead National Forest.

The existing bridge was built in 1965 to replace the structure damaged by massive flooding in 1964. Although the structure is only about 30 years old, inspections have shown substantial deterioration in the bridge's deck and that the structure does not meet current earthquake resistance standards. The proposed bridge would be built immediately upstream from the existing structure on straighter alignment than the current bridge. About 1,300 feet of new roadway would be built to connect the new bridge to existing sections of U.S. Highway 2. The construction of the new bridge would take at least two full seasons to complete. Currently, MDT plans to have the project ready so contractor bids can be accepted early in the year 2000.

This project has the potential to cause temporary impacts on the recreational use of the river and its banks in the vicinity of the highway crossing. In order to construct the proposed bridge, the contractor must install a temporary work bridge to serve as an operating platform for heavy equipment needed for bridge building. Sufficient space between the bottom of supporting beams for the work bridge and the river surface could be provided to ensure floating activities are unaffected.

Additionally, the undeveloped river access and camping area along the west side of the Middle Fork near the northwest end of the existing bridge may need to be used for storing equipment and materials during the construction of the new bridge. To ensure the safety of floaters and others recreating on the bank, use of the informal river access and camping area may have to be temporarily suspended during some stages of work on the project. The old bridge and the work bridge would be removed at the completion of construction.

In an effort to help us identify the potential impacts of this project on commercial river users, we would appreciate your responses to the following questions within your limits of confidentiality:

1. To your knowledge, how often are float trips operated on this section of the Middle Fork? (Number of float trips per week or total number of trips per year would be the most useful information). On the average, how many people are transported on each float trip? What part

P.O. Box 5653, 825 Custer
Helena, Montana 59604
(406) 447-5000
FAX (406) 447-5036
RPA-HLN.com

of the year do you typically run float trips on this section of river? Do you generally put-in or take-out your rafts at the river access point near the existing bridge at Essex or are there other suitable locations? *yes*

2. What is a typical charge or cost per floater for a trip on this section of river? To your knowledge has the number of floaters increased or decreased in the past five years? *yes*
3. Would temporary closures of the river put-in/take-out area near the existing bridge adversely affect your business? If so, how would it impact your floating operation? *yes*
4. How much space for parking do you require at the river access site near Essex? *suburban a trailer*
5. Assuming the river access point near the Essex bridge was closed for extended periods during construction of the new bridge, do you know of any downstream locations (on either public or private land) in the Essex area which you could use as an alternate put-in/take-out point? *yes*
Would extended closures of the river access near the existing bridge be acceptable to you? *yes, provided we can use other location*
6. Do you have any ideas about how adverse effects on your business from the proposed bridge reconstruction could be minimized during construction activities? *do it quickly*
7. Do you know of others besides those on the contact (cc) list that utilize this area extensively?

We appreciate any information that you can provide concerning these questions. Please note that MDT is only in the early development stage of this project. No decisions have been made about restricting the access or use of the river access site near the existing bridge. MDT will be working with the Flathead National Forest and Glacier National Park to identify ways to accommodate continued recreational use of the river in the area of the proposed bridge construction. We welcome your comments on any other concerns or issues that you feel should be addressed in this project. Your comments can be sent to me at the following address:

Robert Peccia & Associates, Inc.
P.O. Box 5653
Helena, MT 59604

We'll include you on our mailing list for this project so we can continue to keep you informed of its development. Thanks for your input and cooperation.

Sincerely,
ROBERT PECCIA & ASSOCIATES, INC.

Daniel M. Norderud

Daniel M. Norderud, AICP
Project Manager

P.S. What about developing the Park side of the bridge for access. They already have facilities.



Middle Fork Flathead River

(Southeast of Essex)

Bridge Replacement Project

BR 1-2 (85) 180

RECEIVED

JUN 02 1998

ROBERT PECCIA
& ASSOCIATES

I have the following comments or questions
about the Bridge Replacement Project:

Dear project Engineer;

I read your informational hand out. I can not understand your concern about traffic accident concerning this bridge. I personally, have driven over this bridge many times with no difficulty. I have ever watch my speed and drive according to conditions of the road. The accidents you mentions were they after the ruling of no speed limit.

Good Sirs, you mention a small amount of \$1.4 million to bring the bridge to Earthquake standard but no mention of the millions and millions of tax payers \$ to construct this proposed Bridge, I would hate to guess how much.

You do not mention ~~the~~ the impact of your projected program on Bull Trout on the river.

You also neglect to mention of the repair already done to the bridge, but you have used pictures to explain and argue your point.

I personally feel that there are more needed project roads that could use this money to greater advantage.

Name Chuck L. Smith
Address 208 1st Ave S.E
Phone Cut Bank MT 59427

(Above Information Is Optional)

Please fold, tape or staple closed, add appropriate postage and mail this form to the address on the back.

RECEIVED

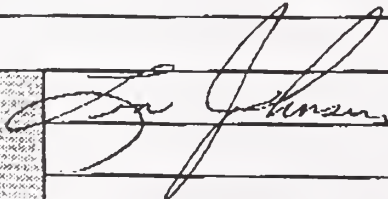
AUG 21 1997

MONTANA STATE HISTORIC PRESERVATION OFFICE

NHPA Section 106 \ Other Consultation

ENVIRONMENTAL

This form constitutes a record of your consultation with the Montana Historic Preservation Officer on a particular project and is the official SHPO reply. The dates of SHPO actions appear in the appropriate boxes.

Please Route This Form To:		MDT Jon Axline	
Your Agency Requested Consultation with the Montana State Historic Preservation Officer (SHPO) on this Project under this Law or Regulation:			
		Section 106	
PROJECT NUMBER	BR1-2(85)180	AGENCY	MDT
PROJECT NAME and Other Descriptions	Middle Fork Flathead River Essex	Dates and Separate Requests to SHPO on This Project	OTHER Agency
			MDT
			Lon
THIS FORM documents		Individual actions.	
Memo(s) to Sender	We concur in the consultants findings. Neither of the identified features contributes to the significance of the Walton Ranger Station Historic District.		
DETERMINATION OF ELIGIBILITY The SHPO Has Considered Whether, per Your Request, Sites Either Meet or Do Not Meet the Criteria of the National Register of Historic Places. The Finding of the SHPO is as Follows:		Sites which Meet National Register Criteria	Sites Not Meeting National Register Criteria
Criterion A Findings	Criterion B Findings	Criterion C Findings	Criterion D Findings
DETERMINATIONS OF EFFECT The shpo has considered whether this undertaking will have an affect on significant historic properties. The finding of the shpo is as follows:		No Eligible or Listed Properties Are Within the Area of Potential Effect	The Project Will Have NO EFFECT on These Eligible Properties
Descriptions of Effects on Eligible Property Using 36 CFR 800.9			The Effect on These Properties is:
			Adverse
			Not Adverse.
Other Comments:			
Reviewer Signatures			8-20-97
			Dates



United States
Department of
Agriculture

Forest
Service
406-755-5401

Flathead National Forest
1935 Third Avenue East
Kalispell, MT 59901

File Code: 7710

Date: April 10, 1997

RECEIVED

APR 15 1997

**ROBERT PECCIA
& ASSOCIATES**

COPY

Mr. Joel Marshik
Montana Department of Transportation
2701 Prospect Avenue
P.O. Box 201001
Helena, MT 59620-1001

Dear Mr. Marshik:

In response to your letter dated February 26, 1997, and in accordance with the Memorandum of Understanding of January 1993, I have the following comments regarding your proposed bridge replacement at Essex.

All lands adjoining this proposed project (as originally presented to Earl Applekamp) are classified as Management Area 18 and managed under the Wild and Scenic Rivers Act. This management direction should be similar to the State's "Section 4(f) Lands" classification. Safety for recreational users and environmental issues, such as sediment, slope stabilization, and fisheries, are paramount concerns by all agencies, and are always well addressed by the Montana Department of Transportation through the MEPA and design processes. I don't anticipate any unique concerns unique to the Forest Service, but do ask that our coordinator be kept advised of any issues or concerns which may arise.

The only issue which may be of concern to us on this project would be to maintain access to the dispersed recreation and river access site immediately upstream from the bridge. This is a frequently used site and permanent public access during construction activity and thereafter is critical.

Earl Applekamp will be the Forest Service's project coordinator for the Essex Bridge replacement project. Earl is the District Ranger of the Glacier View/Hungry Horse District and is located at the Hungry Horse Office, P.O. Box 190340, Hungry Horse, MT 59919. He can be contacted there at (406) 387-5243, or FAX (406) 758-5389.

Sincerely,

RODD E. RICHARDSON
Forest Supervisor

cc:

Earl Applekamp
Don Overly

Daniel M. Norderud, Robert Peccia & Associates, P.O. Box 5653, Helena, MT 59604





United States Department of the Interior

NATIONAL PARK SERVICE

Glacier National Park

Glacier, Montana 59936

RECEIVED

MAR 25 1997

ENVIRONMENTAL

IN REPLY REFER TO:

D30

MAR 21 1997

Mr. Joel M. Marshik, P.E., Manager
Environmental Services
Montana Department of Transportation
2701 Prospect Avenue
P.O. Box 201001
Helena, Montana 59620-1001

Dear Mr. Marshik:

This is in response to your recent letter requesting our participation as a cooperating agency in the reconstruction of the Middle Fork-Flathead River Bridge southeast of Essex, Montana, BR 1-2 (85) 180. As you know, we have been participating in the project to repair the bridge since 1992. We would be happy to continue our involvement as a cooperating agency for the project to replace the bridge.

We have the following comments and concerns, most of which are listed in your letter, about the proposed bridge replacement:

1. Access to our Walton developed area is presently from the east bridge approach. We need to maintain a safe and convenient road access to this developed area.
2. Several of the structures adjacent to Highway 2 in the Walton developed area are included in the Walton Ranger Station Historic District. To preserve the cultural values of this area we would like to minimize the physical, visual, and noise impacts on this district.
3. Impacts to the values and use of the Wild and Scenic River corridor, including river access at this point, should be minimized.
4. Adverse impacts to natural resources including hydrology, water quality, wildlife, fisheries, and air quality should be minimized.
5. Adverse impacts to threatened and endangered species should be avoided.
6. The new bridge should provide for safe pedestrian use.
7. There should be provision for the continuation of several

**MASTER FILE
COPY**

cc: Joe Kolma
Carl Peil
Jim Weaver
PECU/A/FAX

utility systems serving the Walton developed area. The National Park Service maintains a water well house, water line, and electric line immediately upstream from the existing bridge. Flathead County maintains an early flood warning pressure gauging station between the well house and the existing bridge in the river. Gas and telephone lines are located on the existing bridge.

The National Park Service does not have any specific actions proposed for the area near the bridge in the foreseeable future. We do plan to continue the operation of the developed area to serve visitor trailhead, information and picnicking needs, and our own operational needs. We are not aware of any actions proposed by others that would affect this project, however, we suggest ~~that residents and businesses~~ in the adjacent communities of Essex and Pinnacle be involved in the planning.

Glacier National Park has a Master Plan dated 1977, and a Transportation Plan dated 1990. A new General Management Plan is currently being prepared to replace the 1977 Master Plan. All of these plans identify Highway 2, including that portion within the boundary of the Park, as a critical transportation route for visitors and staff around the southern boundary. The reconstruction of the bridge will not affect the provisions of these plans.

We would like to have Bob Dunkley of our staff represent us in this planning. Should you have any questions, please contact him at (406) 888-7916.

Sincerely,

Charles R. Farabach
Acting Superintendent

for David A. Mihalic
Superintendent



United States
Department of
Agriculture

Forest
Service

Region One

200 East Broadway
P.O. Box 7669
Missoula, MT 59807

File Code: 2350/2730

Date: DEC 14 1999

Joel M. Marshik, P.E.
Environmental Services Manager
Montana Department of Transportation
P.O. Box 201001
Helena, Montana 59620-1001

RECEIVED

DEC 16 1999

ENVIRONMENTAL

Dear Mr. Marshik:

This letter is in reference to the proposed Essex Bridge replacement project on Highway 2 in Flathead County. Enclosed is the Wild and Scenic River Section 7 analysis and determination.

The proposed project will not have any long term significant effects on the free flowing status of the Middle Fork of the Flathead Wild and Scenic River or on the outstanding and remarkable values. I concur to the proposed action as defined in the preliminary draft Environmental Assessment.

Once we have received the request for additional right-of-way from the MDOT and FHWA, we shall process a letter of consent.

Sincerely,

GARY A. MORRISON
Director of Recreation, Minerals,
Lands, Heritage and Wilderness

Enclosure

cc:
Flathead National Forest

RECEIVED

DEC 28 1999

ROBERT PECCIA
& ASSOCIATES





United States
Department of
Agriculture

Forest
Service

(406) 758-5200

Flathead National Forest
1935 Third Avenue East
Kalispell, MT 59901

File Code: 2350
Route To:

Date: September 22, 1999

Subject: Wild and Scenic River Section 7 Determination

To: Regional Forester

The Federal Highway Administration and Montana State Department of Transportation are proposing to replace the Essex Bridge on Highway 2. The structure spans the Middle Fork of the Flathead Wild and Scenic River and requires a Wild and Scenic River Section 7 analysis and determination prior to the construction proceeding.

The Flathead National Forest has coordinated with Glacier National Park and prepared the Section 7 analysis and determination for this project. An Environmental Assessment is being prepared for the project by the Federal Highway Administration and the Montana State Department of Transportation. The Environmental Assessment will include the approved Section 7 analysis and determination for the proposed action.

I believe that the proposed project will not have any long-term significant effects on the free flowing status of the river, water quality, or the outstanding and remarkable values that caused the Middle Fork of the Flathead River to be included as a recreational component of the Wild and Scenic River System. I recommend that you approve this determination and consent to the proposed action (FSM 2354.04).

Allen L. Christophersen for

CATHY BARBOULETOS
Forest Supervisor

Enclosures

Draft Regional Forester Letter to Montana Department of Transportation
Essex Bridge W&SR Analysis and Section 7 Determination



ESSEX BRIDGE

SECTION 7 EVALUATION

1) Establish Need and Evaluate Consistency with Management Goals and Objectives

The Federal Highway Administration (FHA) and the Montana Department of Transportation (MDT) have determined that the highway bridge crossing the Middle Fork of the Flathead Wild and Scenic River near Essex, Montana is structurally unsound and that it does not meet current design standards for bridges located in earthquake prone areas. The bridge is located on US Highway 2 which is a primary route across northern Montana. The highway is a major access route to and from the Flathead Valley and Glacier National Park. The existing bridge was in place at the time the Middle Fork was added to the Wild and Scenic River System and when the Flathead Forest Plan was signed. It was deemed to be compatible with Wild and Scenic River designation and with Forest Plan objectives. The east abutment of the bridge and several miles of east bound US 2 are within Glacier National Park. Recent drafts of a new General Management Plan for the Glacier National Park give no indication that the bridge is in conflict with Park management objectives.

2) Describe the Proposed Activity

The Montana Department of Transportation proposed to remove the existing bridge and replace it with a similar structure. The new bridge would be located slightly up stream from the existing facility. New approaches will be constructed on both sides of the bridge. The existing five span structure will be replaced with a four span structure. In addition, the project would create a new access route to the dispersed recreation site located at the west end of the bridge on Forest Service land. The project would also remove remnants of a pre-1964 bridge located downstream from the existing bridge site.

The proposed project is located in Section 14, T29N, R16W, MPM, near the community of Essex in Flathead County, Montana.

Based on recent engineering evaluations, MDT has determined the existing structure is both structurally deficient and functionally obsolete. Furthermore, the design is considered to be "fracture critical". The steel girders have the potential to develop cracks caused by fatigue loading, or repeated cycles of loading and unloading. In a fracture critical system, development of fatigue cracking in one location can lead to collapse of the whole superstructure, as the remaining structure alone can not carry the load. A sudden catastrophic collapse of the bridge would be very likely in the event of an earthquake.

The purpose of the project is to ensure continuing safe travel for users of US 2. A bridge failure or forced closure would halt all through travel between East Glacier and West Glacier. This would be a major inconvenience to travelers as it would require lengthy detours via other east - west routes in Montana or Canada. It would have a serious economic impact on local tourist dependent communities.

It is estimated that the construction of the new bridge would take two years due to the short construction season in the area. Once completed, the bridge would remain in place for the foreseeable future.

Replacement of the bridge will allow safe public travel to continue along US 2 for the foreseeable future.

3) Describe How the Proposed Activity Will Directly Alter Within-Channel Conditions

The proposed activity will directly alter both the stream banks and the stream bed. New abutments will be constructed on both banks of the river. Abutments for the existing bridge will be removed and the site will be restored. Three new piers would be constructed in the stream bed as intermediate supports. MDT proposes to drill shafts to construct the piers. The four piers on the existing bridge will be removed. The location of the active channel will not be affected. Channel geometry will change slightly with construction of the new piers and removal of the old ones. There will be an decrease of one pier in the active channel. Channel slope and form will not be changed by the construction. There will be a slight change in water quality due to construction activities. Use of best management practices should minimize adverse impacts.

4) Describe How the Proposed Activity Will Directly Alter Riparian and/or Floodplain Conditions.

The proposed activity will not alter floodplain conditions. Small areas of riparian vegetation will be disturbed as new abutments are constructed and the old ones removed. Old abutment areas will be revegetated prior to completion of the project. There should be no long term net increase of bare ground in the riparian area.

5) Describe how the Proposed Activity Will Directly Alter Upland Conditions

Construction of new approaches and a new access road to the dispersed recreation site on the west end of the bridge will alter upland conditions. Vegetation will be removed. Drainage patterns will not be changed. The new access road will be paved, eliminating erosion from the surface of the existing route. The old route and abutments will be revegetated. These changes will not affect archeological, cultural or other significant identified resources.

6) Evaluate and Describe How Changes in On-Site Conditions Can/Will Alter Existing Hydrologic or Biologic Processes

Other than the short term effects of construction, there should be no significant changes in either hydrologic or biologic conditions. One bridge is being replaced with another of similar design requiring one less pier in the active channel. Remnants of the pre-1964 bridge piers will be removed. During construction there will undoubtedly be some increase in sediment, but this will be minimized by following best management practices.

7) Estimate the Magnitude and Spatial Extent of Potential Off-Site Changes

There should be no long term off site changes associated with this project. During the construction phase, there may be minor off-site changes in sediment levels.

8) Define the Time Scale Over Which Steps 3-7 are Likely to Occur

All of the effects described above related to construction will occur during a 2 year period most likely beginning in 2000 or 2001. Long term effects of having the bridge on the site will remain for the foreseeable future.

9) Compare Project Analysis to Management Goals and Objectives

The overall management goal is to preserve and enhance those values which caused the Middle Fork of the Flathead to be designated as a recreational component of the Wild and Scenic River System. Objectives are to preserve the free flowing status, water quality, and outstanding and remarkable values associated with the river. These values include wildlife, fisheries, scenery, geology, recreation, and cultural resources.

The existing Essex Bridge predates Wild and Scenic River designation. It is assumed that this structure was compatible with the intent of a recreational river designation. Adverse affects, therefore, are those that the proposed activity would create in addition to those that exist with the current structure

The proposal will actually have a beneficial effect on the free flowing status in that the new bridge will require three in stream piers rather than the four that currently exist. In addition, the remnants of piers from the pre-1964 bridge will be removed.

There will be a minor short term reduction in water quality during construction. This will be minimized by following best management practices. There will be no long term affect to water quality.

There will be no short or long term effects on most wildlife species in the project area. A Biological Evaluation had determined there will be no effect on the endangered peregrine falcon and that the project is not likely to adversely affect the threatened bald eagle, grizzly bear or gray wolf. This is a heavily traveled major highway. Construction will occur at a time when the area is already receiving heavy use by motorists, river floaters and general recreation users. It is unlikely that construction crews will cause additional significant impacts in the area. After construction, the affects on wildlife will be similar to those that exist today.

Fisheries may be affected, in the short term, by increased sediment from construction activities including drilling and blasting. Work will be timed to minimize effects on migrating species. A Biological Evaluation has determined the project may affect, but is not likely to adversely affect the threatened bull trout with the implementation of Coordination and Conservation Measures. There will be no long term affects on fisheries from the project.

Scenery will also be affected in the short term. A temporary construction bridge will be needed for much of the project. During this time there will be three bridges on the site along with a full complement of construction equipment, all of which will be highly visible from the highway and the river. In the long term there will continue to be a single bridge at the site.

There are not outstanding geologic features or cultural resources in the area that will be affected by the project.

Recreation will be adversely impacted during the construction phase. The dispersed recreation site at the west end of the bridge will be used as a construction staging area. This will eliminate public use of a very popular undeveloped river access site. It will affect operation of five commercial river outfitters that use the site intermittently. The construction bridge will partially obstruct the stream channel during the float season requiring river users to navigate under it. Once the project is completed access to the dispersed site will be greatly improved. Long term affects of the bridge on recreation will be similar to those that exist today.

Glacier National Park managers have reviewed the proposal and have determined that it is compatible with Park management goals and objectives.

10) Section 7 Determination

Following the construction phase, the proposed activity will have no long term significant affects on the free flowing status of the river, water quality, or the outstanding and remarkable values that caused the Middle Fork of the Flathead to be included as a recreational component of the Wild and Scenic River system.

Appendix C: Structure Inventory & Appraisal Report

STRUCTURAL INVENTORY AND APPRAISAL

***** IDENTIFICATION ***** CODE *
(008) STRUCTURE NUMBER: P0001180+0.399-1
(002) HIGHWAY DIVISION: KALISPELL 12
(003) COUNTY: FLATHEAD 29
(004) CITY:
(006) FEATURE XED.: MIDDLE FORK FLATHEAD
(007) FACILITY CARRIED: IRR - US 2
(009) LOCATION: ESSEX
(016) LAT: 48 D 16.4 (J17) LONG: 113 D 36.2
***** CLASSIFICATION ***** CODE %
(SR) SUFFICIENCY RATING: 73.8 Y
(112) NBIS BRIDGE LENGTH: 1
(100) DEFENSE HIGHWAY: STATE HIGHWAY AGY 1
(021) MAINTAINED BY: STATE HIGHWAY AGY 1
(022) OWNED BY: STATE HIGHWAY AGY 1
(037) HISTORICAL SIGNIF: NOT ELIGIBLE 5
(PN) PROJECT NO: FHP 13 ERFO 443 (STA:) 142150
(DN) DRAWING NO: 000000

***** AGE AND SERVICE ***** CODE *
(J27) YEAR BUILT: 1968 (106) YEAR RECONS: 0000
(J42) TYPE SERVICE: HIGHWAY WATERWAY 15
(028) LANES ON: 2 UNDER: (J29) ADT: 1421
(J30) YEAR ADT: 93 (109) TRUCK ADT: 50
(J19) BYPASS DETOUR LENGTH: 99 MI

***** STRUCTURE TYPE & MATERIAL ***** CODE *
(043) STRUCTURE TYPE-MAIN: 403
(J44) STRUCTURE TYPE-APPR: 502
(J45) NO. SPANS-MAIN: 4
(J46) NO. SPANS-APPR: 1
(107) DECK STRUCTURE TYPE: CONC IN PLACE 1
(108) WEAR SURF/PROTECTIVE SYS: 1 DEPTH: 0 IN 0
(A) TYPE SURF: CONCRETE NONE
(B) TYPE MEMBRANE: NONE
(C) TYPE DECK PROTECTION: NONE

***** GEOMETRIC DATA ***** CODE *
(048) LENGTH OF MAXIMUM SPAN: 171 FT
(J49) STRUCTURE LENGTH: 744 FT
(050) CURB/SIDEWALK: LEFT: 0.0 FT RIGHT: 0.0 FT
(051) BR RDWY WIDTH (CURB TO CURB): 30.0 FT
(047) TOTAL WIDTH (CLEAR TO OUT): 30.0 FT
(J52) DECK WIDTH (OUT TO OUT): 33.0 FT
(J32) APPROACH ROADWAY WIDTH: 32 FT
(J33) BRIDGE MEDIAN: NO MEDIAN 0
(034) SKEW: 0 (035) FLARED: 0
(053) MIN VERT CLEAR OVER BR. RDWY: 99 FT 99 IN
(054) MIN VERT UNDERCLEAR REF: N 0 FT 0 IN
(055) MIN LAT. UNDERCLEAR RT REF: N 0.0 FT
(J56) MIN LAT. UNDERCLEAR LT: 0.0 FT

***** LOAD RATING & POSTING ***** CODE *
(J31) DESIGN LOAD: HS 20
(J64) OPERATING RATING: 205
(J66) INVENTORY RATING: 230
(LOAD) TYPE 3: 1 TYPE 352: 1 TYPE 3-3: 1
(POST) TYPE 3: 1 TYPE 352: 1 TYPE 3-3: 1
OTHER

***** CONDITION ***** CODE ***** CHANGE ? ***
(J58) DECK: 4
(J59) SUPERSTRUCTURE: -6
(J60) SUBSTRUCTURE: -6
(J61) CHANNEL/CHAN PROTECT: -7
(J62) CULVERT: N
(J65) APPR. RDWY CONDITION: 7

***** APPRAISAL ***** CODE ***** CHANGE ? ***
(J67) STRUCTURAL EVALUATION: 0
(J68) DECK GEOMETRY: 5
(J69) UNDERCLEAR VERT/HORZ: N
(J71) WATERWAY ADEQUACY: 0
(J72) APPR. RDWY ALIGNMENT: 8
(113) SCOUR CRITICAL BRIDGES: 5
(J36) TRAFFIC SAFETY FEATURES: 1-11
BR RAIL TRANS APPR 60-60 TERM

***** INSPECTION ***** INTERVAL ***** DATE *
(J90) LAST INSPECTION DATE: 24 MO. 10/92

(J92, J93) CRITICAL FEATURE INSPECT INTERVAL & DATE
CFI DETAIL CFI CAT INTERVAL CFI DATE
A) FRACTURE CRITICAL: Y 48 MO. 7/83
B) UNDERWATER INSP: N --- 48 MO. 7/83
C) PIN CONNECTED: Y 48 MO. 10/92
D) SNOOPER: 24 MO. 10/92

***** FIELD INSPECTION ***** *****

INSPECTED BY: 2/2/92

DATE INSPECTED: 2/2/92

***** OFFICE REVIEW *****
- BRIDGE EVALUATION UNIT -

ENGINEERING REVIEW NECESSARY? YES NO

REVIEWED BY: DATE

S.I. & A. SUPPLEMENTAL FORM

STRUCTURE NO. P00001 180 + 0.399 / FEATURE CROSSED MIDDLE FK. FLATHER PK

INSPECTED BY S. GERMAN DATE INSPECTED 10-25-94

CONDITION RATINGS

58. ☒ DECK

- A. ☒ CURBS
- B. ☒ FLOORING/SLAB
- C. ☒ GUARD ANGLES
- D. ☒ JOINTS
- E. ☒ MEDIAN
- F. ☒ RAIL/BARRIER
- G. ☒ SIDEWALKS
- H. ☒ WEARING SURFACE
- I. ☐ OTHER

59. ☐ SUPERSTRUCTURE

- A. ☒ BEARING DEVICES
- B. ☒ BRACING
- C. ☒ DRAINAGE
- D. ☒ FLOORBEAMS
- E. ☒ GIRDERS
- F. ☒ PAINT
- G. ☒ STRINGERS
- H. ☒ TRUSSES
- I. ☒ UTILITIES
- J. ☐ OTHER

60. ☐ SUBSTRUCTURE

- A. ☐ ABUTMENTS
- B. ☐ BENTS/PIERS
- C. ☐ BRACING
- D. ☐ CAPS
- E. ☐ COLUMNS
- F. ☐ ENDFILLS
- G. ☒ FOOTINGS/SILLS
- H. ☒ ICE BREAKERS
- I. ☒ PILES/POSTS
- J. ☐ RETAINING WALLS
- K. ☐ OTHER

61. ☐ CHANNEL AND CHANNEL PROTECTION

- A. ☒ CHANNEL LIVING
- B. ☒ DRIFT
- C. ☒ LEVEES
- D. ☒ RIP RAP/GABIONS
- E. ☒ SCOUR/PLACING
- F. ☒ SPUR DIKE
- G. ☒ STREAM BAY
- H. ☒ VEGETATION
- I. ☐ OTHER

62. ☒ CULVERT

- A. ☐ DEPOSITION
- B. ☐ EMBANKMENT
- C. ☐ FOOTINGS
- D. ☐ RAIL/BARRIER
- E. ☐ INVERT
- F. ☐ JOINTS/BOLTS
- G. ☐ RETAINING WALLS
- H. ☐ SHAPE
- I. ☐ OTHER

65. ☒ APPROACH ROADWAY CONDITION

- A. ☒ APPROACH SLAB
- B. ☐ EMBANKMENT
- C. ☒ GUARDRAIL
- D. ☒ JOINTS
- E. ☒ SHOULDERS
- F. ☒ SURFACE
- G. ☒ TRANSITION
- H. ☐ OTHER

APPRAISAL RATINGS

71. ☐ WATERWAY ADEQUACY

- A. ☒ ALIGNMENT
- B. ☒ CAPACITY
- C. ☒ FREEBOARD
- D. ☒ PROFILE
- E. ☐ OTHER

72. ☐ APPROACH ROADWAY ALIGNMENT

- A. ☒ HORIZONTAL CURVE
- B. ☒ LATERAL CLEARANCE
- C. ☒ LOAD POSTED
- D. ☒ SIGNS/MARKERS
- E. ☒ VERTICAL CURVE
- F. ☒ VISIBILITY
- G. ☐ OTHER

REMARKS: (58B) FREQUENT TRANSVERSE CRACKS - SOME W/ EFFLORESCENCE. AREAS OF DELAMINATION. (58D) SPAN 4 - JOINTS LEAKING (59B) SPAN 1 - OCCASIONAL VERTICAL HAIRLINE CRACKS IN DIAPHRAGMS. (59E) B2 - CREVICE CORROSION BETWEEN DECK AND FLANGE AND BETWEEN DECK AND DIAPHRAGM. SPAN 3 - CREVICE CORROSION AT JOINTS NEAR PILE & HANGER ASSEMBLIES. (59F) PAINT FLAKING ON EXTERIOR OF RIGHT GIRDER. (59I) NEW FIBER OPTIC CABLE CONDUIT ACROSS B1 CAP & ON DOWNSTREAM SIDE. (60D) B2 - HAIRLINE CRACKS IN CAP (60E) B3 & B4 COLUMNS HAVE MOD CRACKING. (60F) EROSION AT B1 LEFT. (60I) B2 - HAIRLINE CRACKS IN BEAM SEPT POSTS. (61B) VERY MINOR DRIFT & SCOUR AT B4. (65C) B1 - APPROACH RAIL TOO LOW.

PRIORITY	MAINTENANCE ACTIVITY NUMBERS	MAINTENANCE RECOMMENDATIONS FEDERAL-AID - STATE MAINTAINED ONLY	MAINTENANCE FORCES	
			REPAIRS COMPLETED BY:	DATE
P	111	SEAL JOINTS		
P	111	REPAIR DECK		
R	111	FILL EROSION AT B1 LEFT.		
R	111	CLEAN B2 CAP		

PINS GIVEN AT INSPECTION - NO DEFECTS

Appendix D: "Nationwide" Programmatic *Section 4(f)* Evaluations and Supporting Materials

MONTANA DIVISION
"NATIONWIDE" SECTION 4(f) EVALUATION
 FOR MINOR USAGE OF
**PUBLIC PARKS, RECREATION LANDS, AND WILDLIFE AND
 WATERFOWL REFUGES**

Project # BR 1-2 (85) 180, (P.M.S. C# 1763)
 Project Name: Middle Fork Flathead River -
SE of Essex

Date: March 2, 2001
 Location: Middle Fork of the Flathead
National Wild and Scenic River
Flathead County, Montana

The proposed bridge would be constructed within the Middle Fork of the Flathead Wild and Scenic River and its adjacent Management Corridor (which includes lands in both the Flathead National Forest and Glacier National Park) approximately 0.4 km (0.25 miles) southeast of Essex. This reach of the Middle Fork has been designated as a Recreational River and is jointly managed by the USFS - Flathead National Forest and the National Park Service - Glacier National Park. The proposed project would construct a new bridge just upstream from the existing structure and new approaches would connect the bridge ends to existing sections of U.S. Highway 2. Approximately 1.09 hectares (2.71 acres) of new easement area for the highway must be acquired from the Flathead National Forest land within the Management Corridor and about 1.24 hectares (3.07 acres) of easement area for the highway must be acquired on the Glacier National Park land within the Management Corridor. A dispersed recreation site, located along the west side of the river immediately upstream from the existing bridge, would be used as a construction staging area during the project. A map showing the location of this project within the Wild and Scenic River corridor is in Part IV of the EA.

NOTE: Any response in a box requires additional information. Consult the "Nationwide" Section 4(f) Evaluation criteria.

- | | <u>YES</u> | <u>NO</u> |
|---|--|---|
| 1. Is the 4(f) site adjacent to the existing highway? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2. Does the amount and location of the proposed impact area impair the use of the remaining Section 4(f) land for its intended purpose? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 3. Does the proposed project require more than a <u>minor</u> amount* of the Section 4(f) site for Right-of-Way? The affected area would not exceed 1% of the total area of the Wild and Scenic River Management Corridor. | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 4. Are there any proximity impacts which would impair the use of the 4(f) lands for their intended purpose (defined as "constructive use")? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 5. Have the officials with jurisdiction over the property agreed <u>in writing</u> with the assessment of impacts and the proposed mitigation?
(Initial Section 7 determination completed by the USFS on 12/14/99)
(Revised Section 7 determination is forthcoming) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 6. Have Federal funds — such as the <i>National Land & Water Conservation Fund - Section 6(f)</i> — been used for the acquisition of, or improvements to the 4(f) site?
If <u>yes</u> — has the land conversion/transfer been coordinated with the appropriate Federal agency,
and are they in agreement? | <input type="checkbox"/>
— N.A.
— N.A. | <input checked="" type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/> |
| 7. Is the proposed action under an <u>Environmental Impact Statement (E.I.S.)</u> ? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 8. Is the proposed project on a new location? The centerline of the highway has been shifted slightly upstream (west) to improve the alignment. | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 9. The Scope-of-Work for the proposed project is one of the following:
a) Improved traffic operation;
b) Safety improvements;
c) 3R;
d) Bridge replacement on essentially the same alignment; or
e) Addition of lanes. | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

NOTE: Any response in a box requires additional information. Consult the "NATIONWIDE" SECTION 4(F) EVALUATION criteria.

ALTERNATIVES CONSIDERED

- | | <u>YES</u> | <u>NO</u> |
|--|------------|--------------------------|
| 1. The "do-nothing" ALTERNATIVE has been evaluated, and is <u>not</u> considered to be feasible and prudent. | <u>X</u> | <input type="checkbox"/> |
| 2. An ALTERNATIVE has been evaluated which improves the highway without any 4(f) impacts, and is also <u>not</u> considered to be feasible and prudent. | <u>X</u> | <input type="checkbox"/> |

Rehabilitating the existing bridge was initially planned by MDT. However, total replacement of the structure was proposed after further investigations showed the deterioration to be much worse than initially suspected. The bridge is also considered "fracture critical" by engineers and has undesirable strap and hangar connections which could contribute to a failure of the structure. The alignment of the present roadway and bridge is also a contributing factor to numerous accidents, particularly during icy road conditions. Rehabilitating the bridge without improving the alignment does not meet the project purpose and need.

- | | | |
|--|----------|--------------------------|
| 3. An ALTERNATIVE on a new location avoiding the 4(f) site has been evaluated, and is <u>not</u> considered to be feasible and prudent. | <u>X</u> | <input type="checkbox"/> |
|--|----------|--------------------------|

The proposed action involves building a new bridge to replace an existing structure across a segment of the Middle Fork of the Flathead Wild and Scenic River. The Flathead National Wild and Scenic River and its associated management corridor extends for miles up and downstream from this crossing. The new bridge must cross the Wild and Scenic River and its management corridor at some location in this area since adjoining segments of US Highway 2 exist on both sides of the river. Additionally, the constraints imposed by topography and existing development dictate the bridge be placed in the same area as the present bridge to stay within the previously established transportation corridor. Avoiding this Wild and Scenic River segment would require the establishment of a new route for US Highway 2 outside the river's management corridor on adjoining public lands. This could not be done without causing significant environmental impacts to other public lands and resources in the Flathead National Forest or Glacier National Park. Therefore, no other feasible and prudent location for the highway crossing exists that would avoid impacts to the Middle Fork of the Flathead Wild and Scenic River and its management corridor.

Minor shifts in the road's alignment have been designed to improve the alignment of the new Middle Fork bridge, to allow the existing bridge to remain in service during construction, and to minimize impacts on adjacent land.

Reconstructing the bridge on the existing alignment was examined by MDT but eliminated from consideration. This alignment alternative would not improve the horizontal alignment of US 2 and superelevation on the existing structure which likely contribute to the higher than expected occurrence of accidents at this location, particularly during the winter. Building a new bridge on the existing alignment would require closing US 2 for the duration of the bridge's reconstruction or using an alternate river crossing near the present bridge to maintain traffic on the route. Closing the road for the time needed to reconstruct the bridge on its present location is unacceptable due to the importance of the route to intrastate and interstate travel and commerce. Communities dependent upon recreational visitors to the area and traffic along US 2 would experience adverse economic effects. Providing a detour and alternate crossing in the area would add considerably to the cost of the bridge project and could not be done without causing other temporary environmental impacts to the river and lands in Glacier National Park and the Flathead National Forest.

Descriptions of ALTERNATIVES 2. and 3. are attached.	<u>X</u>	<input type="checkbox"/>
---	----------	--------------------------

See Part III of the attached Environmental Assessment.

MINIMIZATION OF HARM

	<u>YES</u>	<u>NO</u>
1. The proposed project includes all possible planning to minimize harm.	<u>X</u>	<input type="checkbox"/>
2. Measures to minimize harm include the following:		
a) Replacement of the lands used with lands of reasonably equivalent usefulness and location, and of at least comparable value.	<u> </u>	<u>X</u>
b) Replacement of facilities impacted including sidewalks, paths, benches, lighting, trees and other facilities.	<u>X</u>	<u> </u>
The approach and road providing access to the dispersed recreation site along the river will be reconstructed.		
c) Restoration/landscaping of disturbed areas. Other lands disturbed by construction activities, including portions of the dispersed recreation site used as a construction staging area, will be restored. The existing bridge will be removed at the completion of construction.	<u>X</u>	<u> </u>
d) Special design features.	<u>X</u>	<u> </u>
<p>Other activities included with this bridge replacement project will serve to <u>enhance</u> existing conditions in the vicinity of the new bridge site. In response to the requests from the NPS and USFS, MDT will require the contractor to use native rock for riprap and bank protection and for gabions. This measure will attempt to ensure that new rock placed at the crossing is similar in origin and color to river rock and outcrops in the area. MDT will also use guardrail on the bridge and its approaches that will weather to a rusted appearance instead of using standard galvanized guardrail.</p> <p>MDT's proposed bridge will have one less pier in the channel than the existing Structure. This will improve conditions for floaters on the Middle Fork and enhance the appearance of the bridge by reducing the amount of supporting structure in the river channel. The wider shoulder on the new bridge and its approaches will facilitate safer pedestrian and bicycle travel through the area.</p>		
e) Payment of, or improvements to the remaining 4(f) lands equal in cost to fair market value.	<u> </u>	<u>X</u>
f) Other mitigating measures.	<u>X</u>	<u> </u>
<p>MDT will remove a remnant of the pre-1964 bridge from the Middle Fork, a potential obstruction to floaters or an eyesore, if this can be accomplished without causing major impacts to NPS land or the water quality in the Middle Fork.</p> <p>In response to the presence of harlequin ducks (a sensitive species on federal lands in the area), MDT hired a biologist to monitor the species use of the Middle Fork near Essex and develop recommendations for building the bridge within occupied habitat. This study has been completed.</p>		

COORDINATION

	<u>YES</u>	<u>NO</u>
1. The proposed project has been coordinated with the Federal, state, and/or local officials having jurisdiction over the 4(f) lands. USFS - Flathead National Forest (12/14/99 W&S River determination)	<u>X</u>	<input type="checkbox"/>
2) In the case of non-federal 4(f) lands, the official with jurisdiction has been asked to identify any Federal encumbrances <u> </u> and none exist.	<u>X</u>	<input type="checkbox"/>

COORDINATION (Continued)

- 3) Coordination with the U.S. ARMY - Corps of Engineers has been completed, or a *Section 404* Permit (if applicable) is pending.

YES

NO

X

☐

MDT is currently in the process of applying for a **Section 404 Permit** from the Corps.

SUMMARY

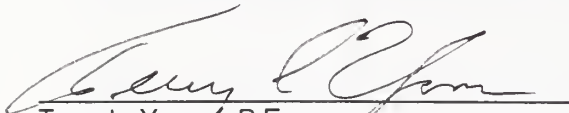
The ADo Nothing alternative ignores the basic transportation needs for providing an earthquake-resistant bridge, improving facilities for pedestrians and bicyclists, and increasing overall traffic safety at this location. The existing bridge has a Sufficiency Rating of 66 (see Part II in the EA) and extensive maintenance or replacement is needed if the structure is to remain in service much longer. MDT's efforts to rehabilitate the existing bridge have been unsuccessful. Building a new bridge slightly upstream from the present structure was the only viable alternative identified by MDT for the Middle Fork crossing near Essex due to limitations caused by steep terrain and adjacent land uses. Constructing a bridge at another location would cause extraordinary environmental impacts and substantially increase engineering and construction costs. The reasons for making these conclusions are provided in Part III of the EA. Therefore, no feasible and prudent alternatives exist to avoid the "use" of land from the Middle Fork of the Flathead Wild and Scenic River and its designated management corridor.

Part III of the attached Environmental Assessment describes the alternatives considered and viable alternatives for this proposed action.

The proposed action meets all criteria regarding the required **Alternatives, Coordination, and Measures to Minimize Harm**. All possible planning to minimize harm to the Middle Fork of the Flathead Wild and Scenic River has been undertaken and will be incorporated in this proposed project. This proposed project therefore complies with the December 23, 1986 Final Nationwide *Section 4(f)* Evaluation by the U.S. DEPARTMENT OF TRANSPORTATION's Federal Highway Administration.

APPROVAL

This document is submitted pursuant to **49 U.S.C. 303** and in accordance with the provisions of **16 U.S.C. 470f**.


Terry L. Yargef, P.E.
Engineering Bureau Chief
MDT Environmental Services

Date: 3-7-01

Approved:


John Smith, For Dale Paulson
Federal Highway Administration

Date: 3-7-2001

MONTANA DIVISION
"NATIONWIDE" SECTION 4(f) EVALUATION
 FOR MINOR USAGE OF
**PUBLIC PARKS, RECREATION LANDS, AND WILDLIFE AND
 WATERFOWL REFUGES**

Project # BR 1-2 (85) 180, (P.M.S. C# 1763)

Date: March 2, 2001

Project Name: Middle Fork Flathead River -
SE of Essex

Location: Glacier National Park-Walton Area
Flathead County, Montana

The proposed bridge would be constructed across the Middle Fork of the Flathead River approximately 0.4 km (0.25 miles) southeast of Essex and would require the use of lands in both Glacier National Park and the Flathead National Forest. The proposed project would construct a new bridge just upstream from the existing structure and new approaches would connect the bridge ends to existing sections of U.S. Highway 2. Approximately 1.24 hectares (ha) (3.07 acres) of new easement area for the highway must be acquired from the U.S. Department of the Interior, National Park Service (NPS) - Glacier National Park. A map showing the location of affected lands within Glacier National Park is attached (or can be found in Part III of the EA).

NOTE: Any response in a box requires additional information. Consult the "Nationwide" Section 4(f) Evaluation criteria.

- | | <u>YES</u> | <u>NO</u> |
|--|---|---|
| 1. Is the 4(f) site adjacent to the existing highway? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2. Does the amount and location of the proposed impact area impair the use of the remaining Section 4(f) land for its intended purpose? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 3. Does the proposed project require more than a <u>minor</u> amount* of the Section 4(f) site for Right-of-Way? This proposed action would affect about 1.24 ha (3.07 acres) of the 410,187 ha (1,013,572 acres) that comprise Glacier National Park. This proposed project would affect 0.0003% of the area within Glacier National Park. | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 4. Are there any proximity impacts which would impair the use of the 4(f) lands for their intended purpose (defined as "constructive use")? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 5. Have the officials with jurisdiction over the property agreed in writing with the assessment of impacts and the proposed mitigation?
(NPS-Glacier National Park is a Cooperating Agency for this EA. Concurrence with the impact assessment and proposed mitigation not yet received). | — | [<input checked="" type="checkbox"/>] |
| 6. Have Federal funds — such as the <i>National Land & Water Conservation Fund - Section 6(f)</i> — been used for the acquisition of, or improvements to the 4(f) site? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| If <u>yes</u> — has the land conversion/transfer been coordinated with the appropriate Federal agency, | — | N.A. <input type="checkbox"/> |
| and are they in agreement? | — | N.A. <input type="checkbox"/> |
| 7. Is the proposed action under an <u>Environmental Impact Statement (E.I.S.)</u> ? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 8. <u>Is</u> the proposed project on a new location? The centerline of the highway has been shifted slightly upstream (west) to improve the alignment at this site. | [<input checked="" type="checkbox"/>] | — |
| 9. The Scope-of-Work for the proposed project is one of the following: | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| a) Improved traffic operation; | | |
| b) Safety improvements; | | |
| c) 3R; | | |
| d) Bridge replacement on essentially the same alignment; or | | |
| e) Addition of lanes. | | |

* NOTE: MDT's guidelines for "minor amounts" of Right-of-Way (including Construction Permits) are limited to either 10% of a parcel under 10 hectares (25 acres), or 1% of a parcel equal to or greater than 10 hectares (25 acres) in size.

NOTE: Any response in a box requires additional information. Consult the "NATIONWIDE" SECTION 4(F) EVALUATION criteria.

ALTERNATIVES CONSIDERED

- | | <u>YES</u> | <u>NO</u> |
|--|------------|--------------------------|
| 1. The "do-nothing" ALTERNATIVE has been evaluated, and is <u>not</u> considered to be feasible and prudent. | <u>X</u> | <input type="checkbox"/> |
| 2. An ALTERNATIVE has been evaluated which improves the highway without any 4(f) impacts, and is also <u>not</u> considered to be feasible and prudent. | <u>X</u> | <input type="checkbox"/> |

Rehabilitating the existing bridge was initially planned by MDT. However, total replacement of the structure was proposed after further investigations showed the deterioration to be much worse than initially suspected. The bridge is also considered "fracture critical" by engineers and has undesirable strap and hangar connections which could contribute to a catastrophic failure of the structure. The alignment of the present roadway and bridge is also a contributing factor to numerous accidents, particularly during icy road conditions. Rehabilitating this bridge without improving the alignment does not meet the project's purpose and need.

- | | | |
|--|----------|--------------------------|
| 3. An ALTERNATIVE on a new location avoiding the 4(f) site has been evaluated, and is <u>not</u> considered to be feasible and prudent. | <u>X</u> | <input type="checkbox"/> |
|--|----------|--------------------------|

The proposed action involves building a new bridge to replace an existing structure across a segment of the Middle Fork of the Flathead River. The new bridge must cross the river at some location in this area since adjoining segments of US Highway 2 exist on both sides of the river. Additionally, the constraints imposed by topography and existing development dictate the bridge be placed in the same area as the present bridge to stay within the previously established transportation corridor. Totally avoiding Glacier National Park lands at Walton would require the establishment of a new route for US Highway 2 outside the boundaries of the park on adjoining lands in the Flathead National Forest. This could not be done without causing significant environmental impacts to lands and resources in the Flathead National Forest or without substantially increasing engineering and construction costs. Therefore, no other feasible and prudent location for the highway crossing exists that would avoid impacts to the Walton area of Glacier National Park.

Minor shifts in the road's alignment have been designed to improve the alignment of the new Middle Fork bridge, to allow the existing bridge to remain in service during construction, and to reduce impacts on adjacent Park lands.

Reconstructing the bridge on the existing alignment was examined by MDT but eliminated from consideration. This alignment alternative would not improve the horizontal alignment of US 2 and superelevation on the existing structure which likely contribute to the higher than expected occurrence of accidents at this location, particularly during the winter. Building a new bridge on the existing alignment would require closing US 2 for the duration of the bridge's reconstruction or using an alternate river crossing near the present bridge to maintain traffic on the route. Closing the road for the time needed to reconstruct the bridge on its present location is unacceptable due to the importance of the route to intrastate and interstate travel and commerce. Communities dependent upon recreational visitors to the area and traffic along US 2 would experience adverse economic effects. Providing a detour and alternate crossing in the area would add considerably to the cost of the bridge project and could not be done without causing other temporary environmental impacts to the river and lands in Glacier National Park and the Flathead National Forest.

- | | | |
|--|----------|--------------------------|
| Descriptions of ALTERNATIVES 2. and 3. are attached. See Part III of the attached Environmental Assessment. | <u>X</u> | <input type="checkbox"/> |
|--|----------|--------------------------|

MINIMIZATION OF HARM

- | | YES
<u>X</u> | NO
<input type="checkbox"/> |
|---|-----------------|--------------------------------|
| 1. The proposed project includes all possible planning to minimize harm. | | |
| 2. Measures to minimize harm include the following: | | |
| a) Replacement of the lands used with lands of reasonably equivalent usefulness and location, and of at least comparable value. | <u>X</u> | — |
| <p>The area presently occupied by US 2 within Glacier National Park is not part of a formal easement or dedicated right-of-way. MDT has been authorized by the NPS to operate and maintain US 2 on about 0.85 ha (2.10 acres) of Glacier National Park land within the project area. Considering the area of this existing authorization and MDT's anticipated right-of-way needs, this proposed project would increase the total area devoted to US 2 within the Park by some 0.39 ha (0.97 acres). MDT has appraised the value of the land required from Glacier National Park for US 2 and the new bridge and determined its value to be \$8000.00.</p> <p>MDT and FHWA will provide the NPS with funding equal to the appraised value of the additional Park land needed for US 2 to serve as a contribution towards the purchase of private lands within Glacier National Park. This measure will help <u>preserve</u> park land by allowing the NPS to acquire new land to offset the additional area of the park that will be devoted to highway purposes.</p> | | |
| b) Replacement of facilities impacted including sidewalks, paths, benches, lighting, trees and other facilities. | <u>X</u> | — |
| <p>The highway approach to the and road to the Walton Ranger Station would be reconstructed with this project. The road shoulders would be wider on the new bridge and its approaches offering pedestrians and bicyclists an improved facility for travel.</p> | | |
| c) Restoration/landscaping of disturbed areas. | <u>X</u> | — |
| <p>Glacier National Park lands disturbed by construction activities would be <u>restored</u> as part of this proposed project. This project would require a total of 1.24 ha (3.07 acres) of park lands. MDT has been authorized by the NPS to operate and maintain US 2 on about 0.85 ha (2.10 acres) of Glacier National Park lands. The new lands required would include a portion of the previously occupied area for US 2 and additional NPS land between the existing road and the Middle Fork of the Flathead River. About 0.22 ha (0.54 acres) of the area now authorized for US 2 would no longer be required and would be restored by MDT to a natural condition. These lands lie immediately southeast of the existing bridge and adjacent to the Walton Ranger Station.</p> | | |
| d) Special design features. | <u>X</u> | — |
| <p>Other activities included with this bridge replacement project will serve to <u>enhance</u> existing conditions in the vicinity of the new bridge site. In response to the requests from the NPS and USFS, MDT will require the contractor to use native rock for riprap and bank protection and for gabions. This measure will attempt to ensure that new rock placed at the crossing is similar in origin and color to river rock and outcrops in the area. MDT will also use guardrail on the bridge and its approaches that will weather to a rusted appearance instead of using standard galvanized guardrail.</p> <p>MDT's proposed bridge will have one less pier in the channel than the existing structure. This will improve conditions for floaters on the Middle Fork and enhance the appearance of the bridge by reducing the amount of supporting structure in the river channel. The wider shoulder on the new bridge and its approaches will facilitate safer pedestrian and bicycle travel through the area.</p> | | |
| e) Payment of, or improvements to the remaining 4(f) lands equal in cost to fair market value. | <u>X</u> | — |

See item 2. a) above.

MINIMIZATION OF HARM (continued)

YES

NO

- f) Other mitigating measures.

X

The alignment of the proposed project has been designed to avoid encroachment on the Walton Ranger Station Historic District, a property listed on the National Register of Historic Places.

The existing bridge will also be removed at the completion of construction.

The remnants of a pre-1964 bridge will also be removed if this can be accomplished without causing major impacts to NPS or USFS land or the water quality in the Middle Fork.

In response to the presence of harlequin ducks (a sensitive species on federal lands in the area), MDT hired a biologist to monitor the species use of the Middle Fork near Essex and develop recommendations for building the bridge within occupied habitat. This study has been completed.

COORDINATION

YES

NO

1. The proposed project has been coordinated with the Federal, state, and/or local officials having jurisdiction over the 4(f) lands.

X

The NPS-Glacier National Park is a Cooperating Agency under the provisions of 23 CFR 771.111(d) and has served in this role for this proposed bridge replacement project since 1997. MDT has also consulted with the NPS since the early 1990's during the agency's previous efforts to rehabilitate this bridge. As a Cooperating Agency, the NPS was afforded opportunities to attend meetings on the project and to review and comment on preliminary versions of MDT's EA and Programmatic Section 4(f) Evaluations done for this proposed project. Letters received from the NPS pertinent to the EA and Section 4(f) matters are listed below:

NPS - Glacier National Park (8/9/99) - comments on "Rough Draft" EA/4(f)
NPS - Glacier National Park (10/12/00) - Section 4(f) comment letter
USDOI -Office of the Secretary (10/24/00) - EA/Section 4(f) comment letter
NPS-Glacier National Park - 4(f) Concurrence not yet received

- 2) In the case of non-federal 4(f) lands, the official with jurisdiction has been asked to identify any Federal encumbrances — and none exist.

X

There are no non-federal 4(f) lands in the project area.

- 3) Coordination with the U.S. ARMY - Corps of Engineers has been completed, or a *Section 404* Permit (if applicable) is pending.

X

MDT is currently in the process of applying for a Section 404 Permit from the Corps.

SUMMARY

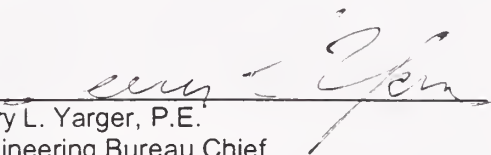
The "Do Nothing" alternative ignores the basic transportation needs for providing an earthquake-resistant bridge, improving facilities for pedestrians and bicyclists, and increasing overall traffic safety at this location. The existing bridge has a Sufficiency Rating of 66 (see Part II in the EA) and extensive maintenance or replacement is needed if the structure is to remain in service much longer. MDT's efforts to rehabilitate the existing bridge have been unsuccessful. Building a new bridge slightly upstream from the present structure was the only viable alternative identified by MDT for the Middle Fork crossing near Essex due to limitations caused by steep terrain and adjacent land uses. Constructing a bridge on the existing alignment or at another location would cause extraordinary environmental impacts and/or substantially increase engineering and construction costs. The reasons for making these conclusions are provided in Part III of the EA. Therefore, no feasible and prudent alternatives exist to avoid the "use" of land from Glacier National Park.

Part III of the attached Environmental Assessment describes the alternatives considered by MDT and the analysis used to identify a preferred alternative for this proposed bridge replacement project.

The proposed action meets all criteria regarding the required **Alternatives, Coordination, and Measures to Minimize Harm**. All possible planning to minimize harm to Glacier National Park has been undertaken and will be incorporated in this proposed project. This proposed project therefore complies with the December 23, 1986 Final Nationwide *Section 4(f)* Evaluation by the U.S. DEPARTMENT OF TRANSPORTATION's Federal Highway Administration.

APPROVAL

This document is submitted pursuant to **49 U.S.C. 303** and in accordance with the provisions of **16 U.S.C. 470f**.

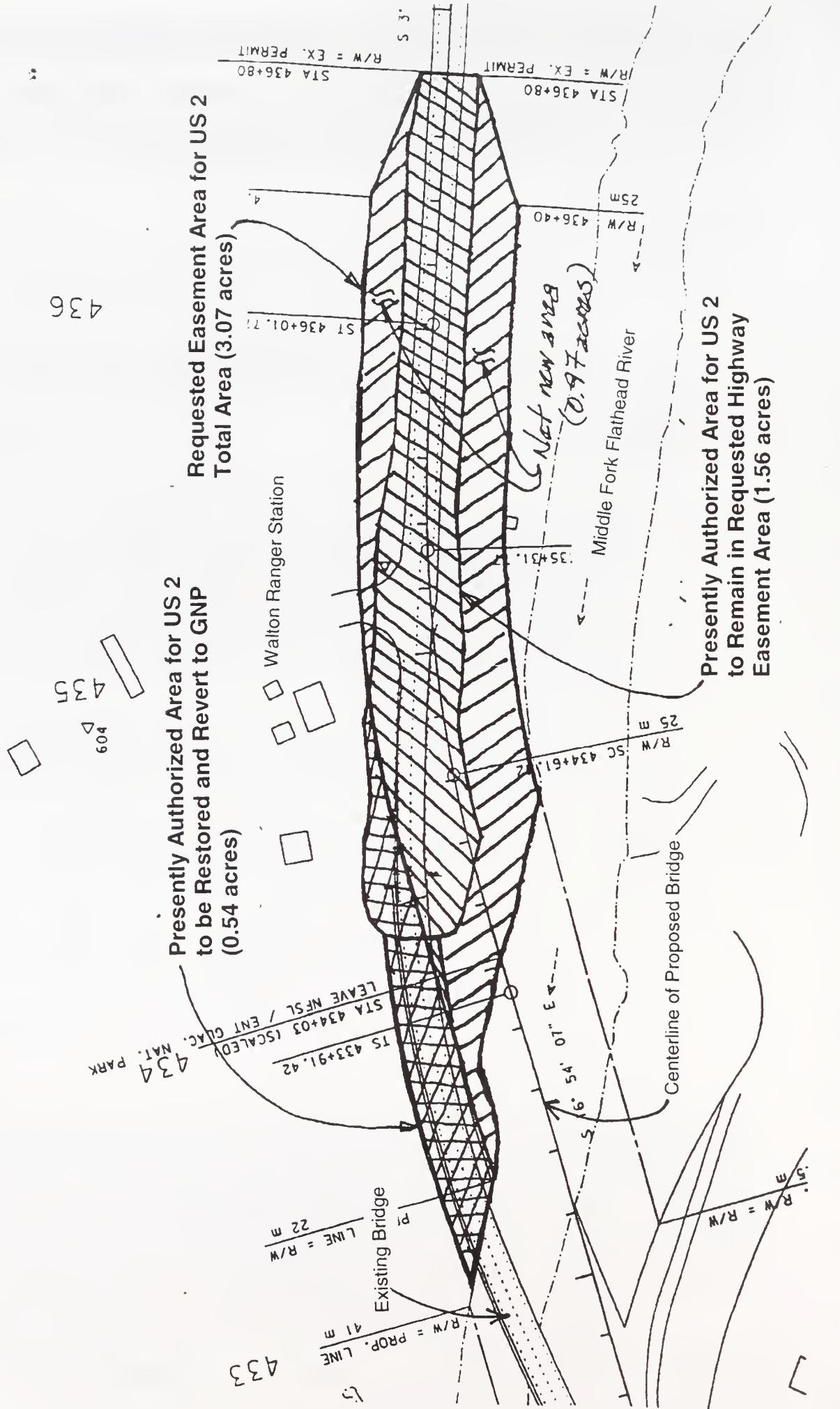

Terry L. Yarger, P.E.
Engineering Bureau Chief
MDT Environmental Services

Date: 3-7-01

Approved:  FOR DAK PAVSICH Date: 3-7-2001
Federal Highway Administration

New area inside final ROW = $3.07 - 1.56 = 1.51$ acres

Net new area within final ROW = $1.51 - 0.54$ acres = 0.97 acres





U.S. Department
of Transportation
Federal Highway
Administration

Montana Division
2880 Skyway Drive
Helena, MT 59602

January 8, 2001

Ms. Suzanne Lewis, Superintendent
Glacier National Park
National Park Service
West Glacier, Montana 59936

Re: Montana Department of Transportation (MDT) Project
BR 1-2(85)180; Middle Fork Flathead River – SE Essex

Dear Ms. Lewis:

This letter is, in part, responses to the issues and concerns you've expressed to this office in your letter of October 12, 2000 regarding the project referenced. Our responses are as follows:

- FHWA agrees that GNP cannot act on any request for a right-of-way easement until such time as the environmental document and Section 4(f) evaluation is complete. MDT is currently revising the Environmental Assessment (EA) to address the comments received from the National Park Service regarding the EA and Section 4(f) evaluations.
- The Federal Highway Administration (FHWA) and MDT agree that a Section 4(f) evaluation to specifically address the taking of Glacier National Park (GNP) lands must be completed, and agree to work towards mitigation of those lands in a manner acceptable to GNP.

The second portion of this letter serves to propose the last element of mitigation for the taking of GNP land for this project. Enclosed please find a map of the east end of the bridge site, which clarifies the land areas under discussion.

In a meeting with MDT and FHWA, you pointed out that the mitigation efforts already agreed upon, as a part of the project, in conjunction with the return of a portion of the land occupied by the existing bridge to GNP management, would serve to meet the elements of enhancement and restoration. In order to meet the element of preservation, you suggested that we work toward a transfer of funds equal to the appraised value of the new take of GNP lands. GNP would use these funds to acquire new Park land when available. This was an agreeable solution to MDT and FHWA, provided the appraised value was reasonable.

MDT has completed their appraisal of the area in question. MDT sent a copy of this appraisal to you on December 22, 2000. Because easement for the existing right-of-way does not appear to be well documented, MDT appraised both the existing right-of-way which will remain (1.56 acres) as well as the new area required for the new bridge (1.51 acres). As stated, the rounded appraised value of the total (3.07 acres) area required for the new bridge is \$8,000. MDT has agreed to offer that amount to GNP as the final element of mitigation for the taking of GNP land.

In an effort to keep this project on schedule for letting this coming spring, we hope that you will agree to this mitigation so that a programmatic Section 4(f) evaluation can be completed. This would be included in the revised EA, which would then be made available for public comment as required under 23 CFR 771.119.

If you have any comments, please contact John Snyder at (406) 449-5302 ext. 233.

Sincerely,



Dale Paulsen
Program Development Engineer

cc: Joel Marshik, MDT Environmental Services
Terry Yarger, MDT Environmental Services
File BR 1-2(85)180

Enclosure



U.S. Department
of Transportation
Federal Highway
Administration

Joseph P. Kolman, P.E.,
Bridge Engineer
Montana Department of Transportation
2701 Prospect Avenue
Helena, Montana 59620

Subject: BR 1-2(86)180; (1763)
Middle Fork Flathead River - Essex

This will confirm our November 30, verbal concurrence in your November 28, proposal to appraise the net increase in land to be acquired by the MDT from the National Park Service for the above-captioned project.

Your proposal to pay the Park Service for the value of the lands needed for the project which will allow the Park Service to acquire replacement lands is also acceptable in this instance provided the costs are nominal. 23 U.S.C 317 provides the normal mechanism for acquiring federal lands for federal-aid highway purposes, usually without payment. We agree with your stated desire to work with the Park Service in the manner described.

cc: Robert Fisher - R/W
Loran Frazier
Carl Peil
Joel Macalik
File

Sincerely,

Merlin J. Voegelé
Division Realty Officer

MASTER FILE
COPY

MONTANA DEPT. OF TRANSPORTATION
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DEC - 5 2000

Montana Division
2880 Skyway Drive
Helena, Montana 59601

HELENA, MONTANA

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ENVIRONMENTAL

Letter of Authorization

Existing agreement

Letter of Authorization between the National Park Service, Glacier National Park, and the State of Montana, Department of Highways, Montana Highway Commission, for the purpose of maintaining the existing road (U. S. Highway 2) from the west Park boundary near Walton Ranger Station (UTM 5349.8N x 306.7E) to the east Park boundary, the Nimrod Underpass (UTM 5346.9N x 309.3E).

The State of Montana Highway Commission is hereby authorized to maintain that portion of U. S. Highway No. 2 located within the boundary of Glacier National Park, specifically that portion from the Essex Bridge at Walton, T29N, R16W, Section 14, to the Nimrod Underpass, T29N, R16W, Section 36, a total length of approximately four miles, and to occupy for that purpose all that portion of land belonging to the United States of America, within Glacier National Park, which is used as a right-of-way for the maintenance of U. S. Highway 2. The dimensions of said right-of-way shall consist of the road traffic surface, shoulders, fill and cut sections, which is commonly called the road prism, and a ten foot width on both sides outside of and adjoining the outer boundaries of said road prism.

The authorization is subject to the conditions outlined below:

1. This authorization gives the consent of the National Park Service to continued maintenance of that portion of U. S. Highway 2 in Glacier National Park, insofar as the property rights of the National Park Service in the said Park are affected.

Said maintenance, as provided for, shall include the usual or customary maintenance of traffic surface, traffic signs, road shoulders, roadside parking strips, bridges, culverts, ditches, and other drainage facilities, removal of fallen trees or other debris, and cleanup of roadway trash or litter resulting from public use. The work incident to maintenance, including snow removal, sanding, or reconstruction of said U. S. Highway 2, shall be done by the permittee without expense to the National Park Service.

2. This authorization shall not be construed as a grant of permanent interest or right-of-way or as an abandonment of use and occupancy of the premises described in this authorization, anything herein contained to the contrary notwithstanding.

The National Park Service is by law and regulation required to preserve all natural features in as nearly their original or natural state as possible, consistent with the maintenance of facilities necessary to public use. The Highway Commission shall take adequate measures as directed and approved by the Park Superintendent to protect the wildlife, scenic and aesthetic values of the Park land covered by this authorization to the fullest extent possible, consistent with the authorized use. Therefore, with respect to road maintenance:

1. In no case shall vegetation of any kind along the roadside be damaged, disturbed, or destroyed, except as is necessary to keep road ditches and shoulders cleared and to provide normal, safe vision from traffic lanes. Where shrubs or small trees obstruct safe vision from traffic lanes, these plants shall be removed entirely, rather than trimmed or pruned, so that the remaining roadside trees, shrubs, and other vegetation will present a natural, undisturbed appearance. Mowing or spraying of road shoulders shall not be done, except with approval of the Park Superintendent.

U.S. Department of Transportation
Federal Highway Administration

**FINAL NATIONWIDE SECTION 4(F) EVALUATION AND APPROVAL
FOR FEDERALLY-AIDED HIGHWAY PROJECTS WITH MINOR
INVOLVEMENTS WITH PUBLIC PARKS, RECREATION LANDS, AND
WILDLIFE AND WATERFOWL REFUGES**

This programmatic Section 4(f) evaluation has been prepared for projects which improve existing highways and use minor amounts of publicly owned public parks, recreation lands, or wildlife and waterfowl refuges that are adjacent to existing highways. This programmatic Section 4 (f) evaluation satisfies the requirements of Section 4(f) for all projects that meet the applicability criteria listed below. No individual Section 4(f) evaluations need be prepared for such projects. (Note: a similar programmatic Section 4(f) evaluation has been prepared for projects which use minor amounts of land from historic sites).

The FHWA Division Administrator is responsible for reviewing each individual project to determine that it meets the criteria and procedures of this programmatic Section 4(f) evaluation. The Division Administrator's determinations will be thorough and will clearly document the items that have been reviewed. The written analysis and determinations will be combined in a single document and placed in the project record and will be made available to the public upon request. This programmatic evaluation will not change the existing procedures for project compliance with the National Environmental Policy Act (NEPA) or with public involvement requirements.

Applicability

This programmatic Section 4(f) evaluation may be applied by FHWA only to projects meeting the following criteria:

1. The proposed project is designed to improve the operational characteristics, safety, and/or physical condition of existing highway facilities on essentially the same alignment. This includes "4R" work (resurfacing, restoration, rehabilitation, and reconstruction), safety improvements, such as shoulder widening and the correction of substandard curves and intersections; traffic operation improvements, such as signalization, channelization, and turning or climbing lanes; bicycle and pedestrian facilities; bridge replacements on essentially the same alignment; and the construction of additional lanes. This programmatic Section 4(f) evaluation does not apply to the construction of a highway on a new location.

2. The Section 4(f) lands are publicly owned public parks, recreation lands, or wildlife and waterfowl refuges located adjacent to the existing highway.

3. The amount and location of the land to be used shall not impair the use of the remaining Section 4(f) land, in whole or in part, for its intended purpose. This determination is to be made by the FHWA in concurrence with the officials having jurisdiction over the Section 4(f) lands, and will be documented in relation to the size, use, and/or other characteristics deemed relevant.

The total amount of land to be acquired from any Section 4(f) site shall not exceed the values in the following Table:

<u>Total Size of Section 4(f) Site</u>	<u>Maximum to be Acquired</u>
< 10 acres	10 percent of site
10 acres - 100 acres	1 acre
> 100 acres	1 percent of site

4. The proximity impacts of the project on the remaining Section 4(f) land shall not impair the use of such land for its intended purpose. This determination is to be made by the FHWA in concurrence with the officials having jurisdiction over the Section 4(f) lands, and will be documented with regard to noise, air and water pollution, wildlife and habitat effects, aesthetic values, and/or other impacts deemed relevant.

5. The officials having jurisdiction over the Section 4(f) lands must agree, in writing, with the assessment of the impacts of the proposed project on, and the proposed mitigation for, the Section 4(f) lands.

6. For projects using land from a site purchased or improved with funds under the Land and Water Conservation Fund Act, the Federal Aid in Fish Restoration Act (Dingell-Johnson Act), the Federal Aid in Wildlife Act (Pittman-Robertson Act), or similar laws, or the lands are otherwise encumbered with a Federal interest (e.g., former Federal surplus property), coordination with the appropriate Federal agency is required to ascertain the agency's position on the land conversion or transfer. The programmatic Section 4(f) evaluation does not apply if the agency objects to the land conversion or transfer.

7. This programmatic evaluation does not apply to projects for which an environmental impact statement (EIS) is prepared, unless the use of Section 4(f) lands is discovered after the approval of the final EIS. Should any of the above criteria not be met, this programmatic Section 4(f) evaluation cannot be used, and an individual Section 4(f) evaluation must be prepared.

Alternatives

The following alternatives avoid any use of the public park land, recreational area, or wildlife and waterfowl refuge:

1. Do nothing.
2. Improve the highway without using the adjacent public park, recreational land, or wildlife and waterfowl refuge.
3. Build an improved facility on new location without using the public park, recreation land, or wildlife or waterfowl refuge.

This list is intended to be all-inclusive. The programmatic Section 4(f) evaluation does not apply if a feasible and prudent alternative is identified that is not discussed in this document. The project record must clearly demonstrate that each of the above alternatives was fully evaluated before the FHWA Division Administrator concluded that the programmatic Section 4(f) evaluation applied to the project.

Findings

In order for this programmatic Section 4(f) evaluation to be applied to a project, each of the following findings must be supported by the circumstances, studies, and consultations on the project:

1. Do Nothing Alternative. The Do Nothing Alternative is not feasible and prudent because: (a) it would not correct existing or projected capacity deficiencies; or (b) it would not correct existing safety hazards; or (c) it would not correct existing deteriorated conditions and maintenance problems; and (d) not providing such correction would constitute a cost or community impact of extraordinary magnitude, or would result in truly unusual or unique problems, when compared with the proposed use of the Section 4(f) lands.

2. Improvement without Using the Adjacent Section 4(f) Lands. It is not feasible and prudent to avoid Section 4(f) lands by roadway design or transportation system management techniques (including, but not limited to, minor alignment shifts, changes in geometric design standards, use of retaining walls and/or other structures, and traffic diversions or other traffic management measures) because implementing such measures would result in: (a) substantial adverse community impacts to adjacent homes, businesses or other improved properties; or (b) substantially increased roadway or structure cost; or (c) unique engineering, traffic, maintenance, or safety problems; or (d) substantial adverse social, economic, or environmental impacts; or (e) the project not meeting identified transportation needs; and (f) the impacts, costs, or problems would be truly unusual or unique, or of extraordinary magnitude when compared with the proposed use of Section 4(f) lands. Flexibility in the application of American Association of State Highway and Transportation Officials (AASHTO) geometric standards should be exercised, as permitted in 23 CFR 625, during the analysis of this alternative.

3. Alternatives on New Location. It is not feasible and prudent to avoid Section 4(f) lands by constructing on new alignment because (a) the new location would not solve existing transportation, safety, or maintenance problems; or (b) the new location would result in substantial adverse social, economic, or environmental impacts (including such impacts as extensive severing of productive farmlands, displacement of a substantial number of families or businesses, serious disruption of established patterns, substantial damage to wetlands or other sensitive natural areas, or greater impacts to other Section 4(f) lands or (c) the new location would substantially increase costs or engineering difficulties (such as an inability to achieve minimum design standards, or to meet the requirements of various permitting agencies such as those involved with navigation, pollution, and the environment); and (d) such problems, impacts, costs, or difficulties would be truly unusual or unique, or of extraordinary magnitude when compared with the proposed use of Section 4(f) lands. Flexibility in the application of AASHTO geometric standards should be exercised, as permitted in 23 CFR 625, during the analysis of this alternative.

Measures to Minimize Harm

This programmatic Section 4(f) evaluation and approval may be used only for projects where the FHWA Division Administrator, in accordance with this evaluation, ensures that the proposed action includes all possible planning to minimize harm. This has occurred when the officials having jurisdiction over the Section 4(f) property have agreed, in writing, with the assessment of impacts resulting from the use of the Section 4(f) property and with the mitigation measures to be provided. Mitigation measures shall include one or more of the following:

1. Replacement of lands used with lands of reasonably equivalent usefulness and location and of at least comparable value.
2. Replacement of facilities impacted by the project including sidewalks, paths, benches, lights, trees, and other facilities.
3. Restoration and landscaping of disturbed areas.
4. Incorporation of design features (e.g., reduction in right-of-way width, modifications to the roadway section, retaining walls, curb and gutter sections, and minor alignment shifts); and habitat features (e.g., construction of new, or enhancement of existing, wetlands or other special habitat types); where necessary to reduce or minimize impacts to the Section 4(f) property. Such features should be designed in a manner that will not adversely affect the safety of the highway facility. Flexibility in the application of AASHTO geometric standards should be exercised, as permitted in 23 CFR 625, during such design.
5. Payment of the fair market value of the land and improvements taken or improvements to the remaining Section 4(f) site equal to the fair market value of the land and improvements taken.
6. Such additional or alternative mitigation measures as may be determined necessary based on consultation with, the officials having jurisdiction over the parkland, recreation area, or wildlife or waterfowl refuge.

If the project uses Section 4(f) lands that are encumbered with a Federal interest (see **Applicability**) coordination is required with the appropriate agency to ascertain what special measures to minimize harm, or other requirements, may be necessary under that agency's regulations. To the extent possible, commitments to accomplish such special measures and/or requirements shall be included in the project record.

Coordination

Each project will require coordination in the early stages of project development with the Federal, State and/or local agency officials having jurisdiction over the Section 4(f) lands. In the case of non-Federal Section 4(f) lands, the official with jurisdiction will be asked to identify any Federal encumbrances. Where such encumbrances exist coordination will be required with the Federal agency responsible for the encumbrance.

For the interests of the Department of Interior, Federal agency coordination will be initiated with the Regional Directors of the U.S. Fish and Wildlife Service, the National Park Service, and the Bureau of Reclamation; the State Directors of the Bureau of Land Management, and the Area Directors of the Bureau of Indian Affairs. In the case of Indian lands, there will also be coordination with appropriate Indian Tribal officials.

Before applying this programmatic evaluation to projects requiring an individual bridge permit the Division Administrator shall coordinate with the U.S. Coast Guard District Commander.

Copies of the final written analysis and determinations required under this programmatic Section 4(f) evaluation shall be provided to the officials having jurisdiction over the involved Section 4(f) area and to other parties upon request.

Approval Procedure

This programmatic Section 4(f) approval applies only after the FHWA Division Administrator has:

1. Determined that the project meets the applicability criteria set forth above;
2. Determined that all of the alternatives set forth in the Findings section have been fully evaluated;
3. Determined that the findings in this document (which conclude that there are no feasible and prudent alternatives to the use of the publicly owned public park, recreation area, or wildlife or waterfowl refuge) are clearly applicable to the project;
4. Determined that the project complies with the Measures to Minimize Harm section of this document;
5. Determined that the coordination called for in this programmatic evaluation has been successfully completed;
6. Assured that the measures to minimize harm will be incorporated in the project; and
7. Documented the project file clearly identifying the basis for the above determinations and assurances.

Issued on: 12/23/86

Approved: /Original Signed By/
Ali F. Sevin
Office of Environmental Policy
Federal Highway Administration

MONTANA DIVISION

**"NATIONWIDE" SECTION 4(f) EVALUATION FOR MINOR IMPACTS
ON
HISTORIC SITES
EXCLUDING HISTORIC BRIDGE REPLACEMENTS**

Project # BR 1-2 (85) 180, (P.M.S. C#1763)

Date: March 2, 2001

Project Name: Middle Fork Flathead River -
SE of Essex

Location: Walton Ranger Station
Historic District (24FH397)
Glacier National Park
Flathead County, Montana

This proposed project would replace the existing bridge across the Middle Fork of the Flathead River on U.S. Highway 2 approximately 0.4 km (0.25 miles) southeast of Essex. The proposed project would construct a new bridge on an alignment just upstream from the existing structure and build approaches to connect to the existing portions of U.S. Highway 2. The work would take place in proximity to Walton Ranger Station Historic District (24FH397), a site listed on the NATIONAL REGISTER OF HISTORIC PLACES. The Walton Ranger Station Historic District consists of the ranger station, a residence, garage, woodshed, barn, a gas shed, and a sign cache. Several other structures near the ranger station were determined to be non-contributing elements to the historic district. The proposed alignment would be shifted away from the historic district and minor widening will be done, however, no new right-of-way would be required from the site. A map showing the location of 24FH397 is provided in Part V of the Environmental Assessment.

NOTE: Any response in a box requires additional information. Consult the "Nationwide" Section 4(f) Evaluation criteria.

	<u>YES</u>	<u>NO</u>
1. Is the 4(f) site adjacent to the existing highway?	<u>X</u>	<input type="checkbox"/>
2. Does the proposed project require the removal or alteration of historic structures, and/or objects?	<input type="checkbox"/>	<u>X</u>
3. Does the proposed project disturb or remove archaeological resources which are important to preserve in-place rather than to recover?	<input type="checkbox"/>	<u>X</u>
4. Is the impact on the 4(f) site considered minor (i.e.: no effect; or no adverse effect)? There will be no effect to 24FH397.	<u>X</u>	<input type="checkbox"/>
5. Has the STATE HISTORIC PRESERVATION OFFICE (SHPO) agreed in writing with the assessment of impacts, and the proposed mitigation?	<u>X</u>	<input type="checkbox"/>
6. Is the proposed action under an <u>Environmental Impact Statement (E.I.S.)</u> ?	<input type="checkbox"/>	<u>X</u>
7. Is the proposed project on a new location? The centerline of the highway has been shifted slightly (less than 5 m) west away from 24FH397.	<input type="checkbox"/>	<u>X</u>
8. The Scope-of-Work for the proposed project is one of the following:	<u>X</u>	<input type="checkbox"/>
a) Improved traffic operation;		
b) Safety improvements;		
c) 3R;		
d) Bridge replacement on essentially the same alignment; or		
e) Addition of lanes.		

NOTE: Any response in a box requires additional information. Consult the "Nationwide" Section 4(f) Evaluation criteria.

ALTERNATIVES CONSIDERED

- | | <u>YES</u> | <u>NO</u> |
|--|------------|--------------------------|
| 1. The "do-nothing" ALTERNATIVE has been evaluated, and is <u>not</u> considered to be feasible and prudent. | <u>X</u> | <input type="checkbox"/> |
| 2. An ALTERNATIVE has been evaluated on the existing alignment which improves the highway without any 4(f) impacts, and is also <u>not</u> considered to be feasible and prudent. | <u>X</u> | <input type="checkbox"/> |

Rehabilitating the existing bridge was initially planned by MDT. However, total replacement of the structure was proposed after further investigations showed the deterioration to be much worse than initially suspected. The bridge is also considered "fracture critical" by engineers and has undesirable strap and hangar connections which could contribute to a catastrophic failure of the structure. The alignment of the present roadway and bridge is also a contributing factor to numerous accidents, particularly during icy road conditions. Rehabilitating the bridge without improving the alignment does not meet the project's purpose and need.

Road widening and bridge replacement on the existing alignment would not cause 4(f) impacts to the historic district but can not be done without affecting the Middle Fork Wild & Scenic River and its associated Management Corridor and lands in the Walton area of Glacier National Park, also 4(f) properties.

- | | | |
|--|----------|--------------------------|
| 3. An ALTERNATIVE on a new location avoiding the 4(f) site has been evaluated, and is <u>not</u> considered to be feasible and prudent. | <u>X</u> | <input type="checkbox"/> |
|--|----------|--------------------------|

The proposed action involves building a new bridge to replace an existing structure across a segment of the Middle Fork of the Flathead River. The new bridge must cross the river at some location in this area since adjoining segments of US Highway 2 exist on both sides of the river. Additionally, the constraints imposed by topography and existing development dictate the bridge be placed in the same area as the present bridge to stay within the previously established transportation corridor. Totally avoiding Glacier National Park lands at Walton would require the establishment of a new route for US Highway 2 outside the boundaries of the park on adjoining lands in the Flathead National Forest. This could not be done without causing significant environmental impacts to lands and resources in the Flathead National Forest or without substantially increasing engineering and construction costs.

As indicated above, the road widening and bridge replacement on the proposed new location would not cause 4(f) impacts to the Walton Ranger Station Historic District. Although the historic district can and would be avoided, building a new bridge and its approaches at any other nearby location can not be done without affecting other potential 4(f) resources like the Middle Fork Wild & Scenic River and its associated Management Corridor and public lands in Glacier National Park and the Flathead National Forest. MDT and FHWA also have a general obligation under Section 4(f) to avoid these public landholdings and/or recreation sites if possible.

MINIMIZATION OF HARM

- | | | |
|--|----------|--------------------------|
| 1. The proposed project includes all possible planning to minimize harm. | <u>X</u> | <input type="checkbox"/> |
| 2. Measures to minimize harm include the following: | | |

The centerline of the new road has been shifted westward in the area of 24FH397 which will avoid impacts on the site. The proposed project will remain within the area of Glacier National Park now authorized for U.S. Highway 2 (which is outside the Historic District boundary).

COORDINATION

1. The proposed project has been **COORDINATED** with the following:

- | | | |
|--|---------------|-------------------------------------|
| a) SHPO (August 20, 1997) | <u> X </u> | <input type="checkbox"/> |
| b) ADVISORY COUNCIL ON HISTORIC PRESERVATION
Since there would be no effect to the Historic District coordination with
The Advisory Council on Historic Preservation is unnecessary. | <u> </u> | <input checked="" type="checkbox"/> |
| c) Property owners (meeting with Parma Addition Homeowners Association) | <u> X </u> | <u> </u> |
| d) Local/State/Federal agencies
USFS-Flathead National Forest - Cooperating Agency for project
NPS-Glacier National Park - Cooperating Agency for project
U.S. Fish and Wildlife Service - Cooperating Agency for project | <u> X </u> | <input type="checkbox"/> |

2. One of the preceding had the following comment(s) regarding this proposed project, and/or the mitigation:

The Montana SHPO concurred that several buildings at the Walton Ranger Station outside the prescribed boundaries of the historic district were not contributing elements to the historic district. SHPO also concurred that there would be no effect to 24FH397 since the road will be shifted away from the site.

The Parma Homeowners requested that a community well house be avoided.

The USFS issued a Section 7 Wild and Scenic River determination for this project on December 14, 1999 that concluded the proposed bridge replacement would not have an adverse effect on the free-flowing nature or other remarkable characteristics of the Middle Fork of the Flathead Wild and Scenic River. A revised Section 7 Analysis for this project is forthcoming from the USFS.


SUMMARY

The "Do Nothing" alternative ignores the basic transportation needs for providing an earthquake-resistant bridge, improving facilities for pedestrians and bicyclists, and increasing overall traffic safety at this location. The existing bridge has a Sufficiency Rating of 66 (see Part II in the EA) and extensive maintenance or replacement is needed if the structure is to remain in service much longer. MDT's efforts to rehabilitate the existing bridge have been unsuccessful. Building a new bridge slightly upstream from the present structure was the only viable alternative identified by MDT for the Middle Fork crossing near Essex due to limitations caused by steep terrain and adjacent land uses. Constructing a bridge at another location would cause extraordinary environmental impacts and substantially increase engineering and construction costs. Part III of the attached Environmental Assessment describes the alternatives considered and viable alternatives for this proposed action.

The proposed action meets all criteria regarding the required **Alternatives, Coordination, and Measures to Minimize Harm**. All possible planning to minimize harm to the Walton Ranger Station Historic District has been undertaken and will be incorporated in this proposed project. This proposed project therefore complies with the December 23, 1986 Final Nationwide *Section 4(f)* Evaluation by the U.S. DEPARTMENT OF TRANSPORTATION's Federal Highway Administration.

APPROVAL

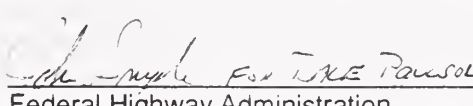
This document is submitted pursuant to **49 U.S.C. 303** and in accordance with the provisions of **16 U.S.C. 470f**.



Terry L. Yarger, P.E.
Engineering Bureau Chief
MDT Environmental Services

Date: 3-7-01

Approved:



Mike Rowson For Mike Rowson
Federal Highway Administration

Date: 3-7-2001

U.S. Department of Transportation
Federal Highway Administration

**FINAL NATIONWIDE SECTION 4(F) EVALUATION AND APPROVAL FOR
FEDERALLY-AIDED HIGHWAY PROJECTS WITH MINOR INVOLVEMENTS
WITH HISTORIC SITES**

This programmatic Section 4(f) evaluation has been prepared for projects which improve existing highways and use minor amounts of land (including non-historic improvements thereon) from historic sites that are adjacent to existing highways. This programmatic Section 4(f) evaluation satisfies the requirements of Section 4(f) for all projects that meet the applicability criteria listed below. No individual Section 4(f) evaluations need be prepared for such projects. (Note a similar programmatic Section 4(f) evaluation has been prepared for projects which use minor amounts of publicly owned public parks, recreation lands, or wildlife and waterfowl refuges).

The FHWA Division Administrator is responsible for reviewing each individual project to determine that it meets the criteria and procedures of this programmatic Section 4(f) evaluation. The Division Administrator's determinations will be thorough and will clearly document the items that have been reviewed. The written analysis and determinations will be combined in a single document and placed in the project record and will be made available to the public upon request. This programmatic evaluation will not change the existing procedures for project compliance with the National Environmental Policy Act (NEPA) or with public involvement requirements.

Applicability

This programmatic Section 4(f) evaluation may be applied by FHWA only to projects meeting the following criteria:

1. The proposed project is designed to improve the operational characteristics, safety, and/or physical condition of existing highway facilities on essentially the same alignment. This includes "4R" work (resurfacing, restoration, rehabilitation and reconstruction); safety improvements, such as shoulder widening and the correction of substandard curves and intersections; traffic operation improvements, such as signalization, channelization, and turning or climbing lanes; bicycle and pedestrian facilities; bridge replacements on essentially the same alignment, and the construction of additional lanes. This programmatic Section 4(f) evaluation does not apply to the construction of a highway on a new location.

2. The historic site involved is located adjacent to the existing highway.

3. The project does not require the removal or alteration of historic buildings, structures or objects on the historic site.

4. The project does not require the disturbance or removal of archeological resources that are important to preserve in place rather than to remove for archeological research. The determination of the importance to preserve in place will be based on consultation with the State Historic Preservation Officer (SHPO) and, if appropriate, the Advisory Council on Historic Preservation (ACHP).

5. The impact on the Section 4(f) site resulting from the use of the land must be considered minor. The word minor is narrowly defined as having either a "no effect" or "no adverse effect" (when applying the requirements of Section 106 of the National Historic Preservation Act and 36 CFR Part 800) on the qualities which qualified the site for listing or eligibility on the National Register of Historic Places. The ACHP must not object to the determination of "no adverse effect."

6. The SHPO must agree, in writing with the assessment of impacts of the proposed project on and the proposed mitigation for the historic sites.

7. This programmatic evaluation does not apply to projects for which an environmental impact statement (EIS) is prepared, unless the use of Section 4(f) lands is discovered after the approval of the final EIS. Should any of the above criteria not be met, this programmatic Section 4(f) evaluation cannot be used, and an individual Section 4(f) evaluation must be prepared.

Alternatives

The following alternatives avoid any use of the historic site.

1. Do nothing.
2. Improve the highway without using the adjacent historic site.
3. Build an improved facility on new location without using the historic site.

This list is intended to be all-inclusive. The programmatic Section 4(f) evaluation does not apply if a feasible and prudent alternative is identified that is not discussed in this document. The project record must clearly demonstrate that each of the above alternatives was fully evaluated before the FHWA Division Administrator concluded that the programmatic Section 4(f) evaluation applied to the project.

Findings

In order for this programmatic Section 4(f) evaluation to be applied to a project, each of the following findings must be supported by the circumstances, studies, and consultations on the project:

1. Do Nothing Alternative The Do Nothing Alternative is not feasible and prudent because: (a) it would not correct existing or projected capacity deficiencies or; (b) it would not correct existing safety hazards; or (c) it would not correct existing deteriorated conditions and maintenance problems; and (d) not providing such correction would constitute a cost or community impact of extraordinary magnitude, or would result in truly unusual or unique problems, when compared with the proposed use of the Section 4(f) lands.

2. Improvement without Using the Adjacent Section 4(f) Lands It is not feasible and prudent to avoid Section 4(f) lands by roadway design or transportation system management techniques (including, but not limited to, minor alignment shifts, changes in geometric design standards, use of retaining walls and/or other structures, and traffic diversions or other traffic management measures) because implementing such measures would result in: (a) substantial adverse community impacts to adjacent homes, businesses or other improved

properties; or (b) substantially increased roadway or structure cost; or (c) unique engineering, traffic, maintenance, or safety problems, or (d) substantial adverse social, economic, or environmental impacts; or (e) the project not meeting identified transportation needs; and (f) the impacts, costs, or problems would be truly unusual or unique, or of extraordinary magnitude when compared with the proposed use of Section 4(f) lands. Flexibility in the application of American Association of State Highway and Transportation officials (AASHTO) geometric standards should be exercised, as permitted in 23 CFR 625, during the analysis of this alternative.

3. Alternatives on New Location It is not feasible and prudent to avoid Section 4(f) lands by constructing on new alignment because (a) the new location would not solve existing transportation safety or maintenance problems; or (b) the new location would result in substantial adverse social, economic, or environmental impacts (including such impacts as extensive severing of productive farmlands, displacement of a substantial number of families or businesses, serious disruption of established travel patterns, substantial damage to wetlands or other sensitive natural areas, or greater impacts to other Section 4(f) lands); or (c) the new location would substantially increase costs or engineering difficulties (such as an inability to achieve minimum design standards, or to meet the requirements of various permitting agencies such as those involved with navigation, pollution, and the environment); and (d) such problems, impacts, costs, or difficulties would be truly unusual or unique, or of extraordinary magnitude when compared with the proposed use of Section 4(f) lands. Flexibility in the application of AASHTO geometric standards should be exercised, as permitted in 23 CFR 625, during the analysis of this alternative.

Measures to Minimize Harm

This programmatic Section 4(f) evaluation and approval may be used only for projects where the FHWA Division Administrator, in accordance with this evaluation, ensures that the proposed action includes all possible planning to minimize harm. Measures to minimize harm will consist of those measures necessary to preserve the historic integrity of the site and agreed to, in accordance with 36 CFR Part 800 by the FHWA, the SHPO, and as appropriate, the ACHP.

Coordination

The use of this programmatic evaluation and approval is conditioned upon the satisfactory completion of coordination with the SHPO, the ACHP, and interested persons as called for in 36 CFR Part 800. Coordination with interested persons, such as the local government, the property owner, a local historical society, or an indian tribe, can facilitate in the evaluation of the historic resource values and mitigation proposals and is therefore highly encouraged.

For historic sites encumbered with Federal interests, coordination is required with the Federal agencies responsible for the encumbrances.

Before applying this programmatic evaluation to projects requiring an individual bridge permit, the Division Administrator shall coordinate with the U.S. Coast Guard District Commander.

Approval Procedure:

This programmatic Section 4(f) approval applies only after the FHWA Division Administrator has:

1. Determined that the project meets the applicability criteria set forth above;
2. Determined that all of the alternatives set forth in the Findings section have been fully evaluated;
3. Determined that the findings in this document (which conclude that there are no feasible and prudent alternatives to the use of land from or non-historic improvements on the historic site) are clearly applicable to the project;
4. Determined that the project complies with the Measures to Minimize Harm section of this document;
5. Determined that the coordination called for in this programmatic evaluation has been successfully completed;
6. Assured that the measures to minimize harm will be incorporated in the project; and
7. Documented the project file clearly identifying the basis for the above determinations and assurances.

Issued on: 12/23/86

Approved: /Original Signed By/
Ali Sevin, Director
Office of Environmental Policy
Federal Highway Administration

Appendix E: MDT/NPS Agreement for Revegetation of Bridge Demolition Areas

Appendix E: MDTNR Agreement for Revegetation of Bridge Demolition Areas

AN AGREEMENT BETWEEN THE
MONTANA DEPARTMENT OF TRANSPORTATION AND THE
UNITED STATES DEPARTMENT OF THE INTERIOR, NATIONAL PARK SERVICE
FOR
REVEGETATION OF BRIDGE DEMOLITION AREAS SOUTHEAST OF ESSEX
UNDER PROJECT BR 1 - 2 (85) 180

Whereas, the Montana Department of Transportation (MDT) intends to construct a new bridge over the Middle Fork of the Flathead River southeast of Essex, and on completion of that construction, MDT will remove the existing bridge and obliterate the existing approach fills, the parties agree that this agreement provides a framework within which MDT will contract for the services of the United States Department of the Interior, National Park Service, Glacier National Park (GNP) to perform re-vegetation of the obliterated fill areas. This agreement is entered into this twenty-first day of December, 1998, by and between the Montana Department of Transportation, and the United States Department of the Interior, National Park Service, Glacier National Park.

In consideration of the mutual promises and covenants herein contained, the parties agree: 1. before demolition work begins, GNP will spray the area for weeds. 2. MDT will remove the existing structure and approach fills, grading the site to match adjacent ground contours and conserving topsoil where possible for re-use at the site. MDT will use this topsoil to provide a finished surface 50 mm. thick over an area of approximately 0.62 hectares. If the conserved topsoil will not cover the area to this thickness, MDT will provide additional topsoil from the nearest available site meeting GNP requirements for low level of contamination with weed seeds. 3. MDT will perform the obliteration, grading, and topsoil placement and, if necessary will provide additional topsoil, at its own expense.


4. GNP will assume responsibility for providing all plants, seeds, materials and labor necessary to restore vegetative growth on this site, at its own expense. GNP assumes the economic and environmental risk of failure of the re-vegetation effort. 5. GNP will bill MDT at the end of each federal fiscal year for the work completed within that fiscal year and MDT will compensate GNP with full payment of the billed amount. At the end of the work or at the end of project, which ever comes first, MDT will make one final lump-sum payment to GNP to bring the total compensation for the work to \$29,000. 6. GNP agrees to use this money only for the purpose of re-vegetating this site.

GNP, by signing this document, covenants not to sue and further agrees to indemnify MDT and hold harmless its agents and employees for any claims from third parties affected by GNP's actions.

This contract contains the entire agreement between the parties, and no promises, statements, or inducements made by either party not in this contract shall bind either party's actions.

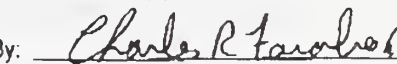
Montana Department of Transportation

By:


for Marvin Dye, Director of Transportation

Glacier National Park

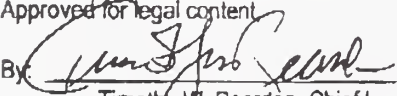
By:


for David A. Mihalic, Superintendent

JAN 13 1999

Approved for legal content

By:


Timothy W. Reardon, Chief Legal Counsel

Appendix F: Written Public Comments on the Initial EA and MDT's Responses

Doug Bonham's March 30, 2000 Letter

On April 3, 2000, MDT Environmental Services received a letter from **Doug Bonham** containing comments on the Environmental Assessment and 4(f) Evaluation. Responses to Mr. Bonham's comments (shown in ***bold and italicized text***) are presented below. Please note that page numbers referenced below refer to those in MDT's initial Environmental Assessment made available for public review and comment on March 14, 2000.

- 1) ***This document does not address potentially significant impacts on the dispersed recreational area on the Forest Service side of the river. This site has a high recreational value due to the large sandy beach, easy river access, excellent views of a heavily used big game feeding area on Scalplock Mountain, and because it is a badly needed escape from the crowded, overly regulated National Park. The quiet, secluded nature of this site exists only because vehicle access to the area is nearly invisible to 65 mph tourists. The Preferred Alternative could significantly alter this condition by making an obvious break in the guardrail which would be visible to people as they drive across the bridge. You only have to drive a few miles east to see the heavy recreational use that occurs at visible river access points. Impacts from significantly increased recreational use would include garbage, noise, and human feces from the lack of toilet facilities at this site. Additionally, the lack of campfire rings at this site would significantly increase the risk for the historic Izaak Walton Inn and the residences in the Parma Subdivision. Dense vegetation leading up a steep hillside from these unprotected campfire sites to the Izaak Walton Inn is an accident waiting to happen. A wildfire racing up this hill to the historic inn and residences would happen much too quickly for fire crews to respond.***

While we disagree with your opinion that the dispersed recreation site is a quiet and secluded area (particularly in summer months with additional traffic and river activity), we do agree that the approach and access road to the site would be more obvious to motorists on U.S. Highway 2 because of the separation between segments of guardrail. The design of the approach would allow both eastbound and westbound motorists to turn onto the access road from the highway. No advance signing for the dispersed recreation site exists along U.S. Highway 2 nor has any advance highway signing for the site been proposed by MDT or the U.S. Forest Service.

It is impossible to accurately predict if changing the access to the dispersed recreation site would lead to substantially increased use of the site. Our best reasoning indicates that the impacts of the proposed action on the long-term recreational use of this site or other public lands in the area would not be significant. This belief is supported in part by the Section 7 Wild and Scenic River Evaluation for this project (See **Appendix B** of the EA) prepared by the USFS- Flathead National Forest.

MDT believes there is an obligation to perpetuate public access the dispersed recreation area

from tourists using the new river access road. And the recreational value of the open, sunny, sandy beach on the Forest Service side far outweighs the dark, damp little trail access on the Park Service side.

In this instance, the responsibility for preserving recreational and historical sites rests with the MDT and FHWA under *Section 4(f)* of the U.S. Department of Transportation Act of 1966. Highway agencies are obligated under this law to avoid impacts to publicly owned parks, recreation areas, wildlife and waterfowl refuges, and significant historic sites unless there is no feasible and prudent alternative to the use of land from such properties. If impacts are unavoidable, the proposed action must include all possible planning to minimize harm to such properties.

The National Park Service's Walton Ranger Station Historic District is a property listed on the National Register of Historic Places. By law, impacts to this significant historic site must be avoided by MDT unless there is no feasible and prudent alternative to impacting the property. The proposed alignment avoids impacts to the historic district. **Part III: Alternatives Considered** in the EA describes why this crossing location is preferred over other sites.

The project's location was not determined because it is easier to "trash" Forest Service land than land in Glacier National Park. Steep terrain, the existing highway's location, development in the area, and MDT's design parameters limit viable river crossing points to locations near the present bridge. Both Glacier National Park and the Flathead National Forest are important public lands and consideration has been given to protecting these resources and preserving the public's ability to access and use the lands. MDT has and will continue to work closely with both the National Park Service and the U.S. Forest Service on the development and implementation of this project.

Mr. Bonham suggested the following Mitigations:

1) *Build the bridge downstream.*

Building a new bridge downstream of the existing crossing would introduce additional and undesirable curves in the alignment of US 2. Grades on the approaches would likely be steeper than those of the existing highway. Further, this alternative would require substantial amounts of new right-of-way and ground disturbance within Glacier National Park. US 2 would have to be relocated to the east of the Walton Ranger Station Historic District requiring considerable clearing and excavation from the mountainside directly behind the ranger station. The visual impacts associated with clearing and excavation for the new road would cause adverse impacts to the historic site and surrounding lands in the park.

2) *Mitigate potential increased recreation use by giving the Forest Service money to build fire rings and pit toilets. Or don't allow overnight camping.*

MDT does not have the authority to prohibit camping or change the use of the dispersed recreation site. To our knowledge, the U.S. Forest Service has no plans to alter the management of or install improvements at the dispersed recreation site.

Appendix F: Written Public Comments on the Initial EA and MDT's Responses

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While we disagree with your opinion that the dispersed recreation site is a quiet and secluded area (particularly in summer months with additional traffic and river activity), we do agree that the approach and access road to the site would be more obvious to motorists on U.S. Highway 2 because of the separation between segments of guardrail. The design of the approach would allow both eastbound and westbound motorists to turn onto the access road from the highway. No advance signing for the dispersed recreation site exists along U.S. Highway 2 nor has any advance highway signing for the site been proposed by MDT or the U.S. Forest Service.

It is impossible to accurately predict if changing the access to the dispersed recreation site would lead to substantially increased use of the site. Our best reasoning indicates that the impacts of the proposed action on the long-term recreational use of this site or other public lands in the area would not be significant. This belief is supported in part by the Section 7 Wild and Scenic River Evaluation for this project (See **Appendix B** of the EA) prepared by the USFS- Flathead National Forest.

MDT believes there is an obligation to perpetuate public access the dispersed recreation area

along the Middle Fork because the proposed alignment for the new bridge and its approaches would eliminate the existing approach. This obligation is reinforced by the fact that a relatively high level of seasonal recreational activity presently occurs at this location. The approach was moved to the other side of the road since it presented the only viable location for constructing an approach and road that would preserve public access to the dispersed recreation site. The adverse impacts related to the loss of public access to the dispersed recreation site were judged to be more substantial than those associated with the perpetuation of access to the site.

Many of the adverse impacts associated with use of the dispersed recreational area are already being experienced and the risks you cite exist today. To our knowledge, the U.S. Forest Service has no intention to change its management direction for this area and does not plan to install fire rings, garbage containers, toilet facilities or other recreational improvements at this location.

- 2) ***This document does not provide sufficient information to analyze potential affects on increased recreational use. I couldn't tell exactly where the new access road would be, nor how visible it would be to vehicles on Highway 2.***

We do not anticipate that the perpetuation of access will, of itself, cause significant impacts in the form of increased use of the dispersed recreation site.

The centerline of new approach for the proposed access road would be about 138 feet north of the end of the existing bridge and be along the east side of the highway. This location would be about 295 feet north of the end of the new bridge. Figure 2a (page 17) shows the U.S. Highway 2 approach and the proposed centerline for the access road.

The proposed access road would likely be visible to westbound motorists on their approach to the new bridge since the new road and bridge would have a more tangent (straight) alignment at the crossing and would be shifted slightly upstream. Motorists would briefly see the access road and a short section of gabion retaining wall that would be built along the facing riverbank. The intersection of the access road and U.S. Highway 2 would be visible to both eastbound and westbound motorists due to a break in guardrail segments along the roadway. Eastbound motorists would not see the remainder of the access road. It would be irresponsible for MDT to leave, or create, and unsafe approach.

- 3) ***Increased recreational use of this site would increase the fishing pressure at the mouth of Ole Creek, which your document correctly identifies as a staging area for the endangered spawning bull trout. It could also increase the disturbance of the harlequin duck feeding area along the rocks on the Park Service side immediately downstream from the bridge. Harlequins also use the mouth of Ole Creek. Locating the access road further downstream than the current location could greatly increase recreational use and fishing pressure at the mouth of Essex Creek. Currently, tourists don't typically walk downstream from the recreation site because that area is visually blocked by the bridge. The Preferred Alternative would make this sensitive riparian area much more visible and accessible to disturbance.***

Again, we do not anticipate that the perpetuation of access to the dispersed recreation site will, of

itself, cause significant impacts in the form of increased use of the dispersed recreation site or other public lands adjacent to the river.

- 4) *This visual quality and noise levels at this important recreational site would also be significantly impacted by moving the bridge closer to the sandy beach. The photograph and simulation on page 21 attempt to show visual impacts. But these are views from the Park Service side. The Park Service side is a dark, damp, mosquito infested parking lot, with lousy river access, and is only used by hikers accessing the backcountry. These hikers do not use the bridge vicinity at all. The Forest Service side, with it's beautiful campsites and sandy beach, would experience significantly increased traffic noise, and the views of the elk and grizzlies on Scalplock would be partially blocked by the new bridge.*

We acknowledge that the new bridge and its approaches would be closer to the sandy beach you refer to than at present. In response to your comment, the $L_{eq}(h)$ noise levels at the dispersed recreation site (in the vicinity of the sandy beach) were estimated using a noise prediction nomograph that employs inputs like the design hourly traffic volume, design speed, and estimated numbers of vehicles by class (autos, medium and heavy trucks). This procedure yielded an $L_{eq}(h)$ noise level of about 60 dBA based on the current bridge location and 63 dBA noise level for MDT's proposed bridge location. The results of this analysis represent a worst case (it assumes the road and recreation site were on approximately the elevation). Measured noise levels would likely vary due to the difference in elevation between the elevated bridge site and the riverside area. The analysis does not suggest that noise levels would increase substantially (a 10 dBA or more increase over existing levels) with the proposed shift in the bridge's alignment.

- 5) *This document does not analyze potential temporary impacts on the dispersion of endangered wolves along the Middle Fork River corridor. Both construction activity and increased recreation in this narrowed stretch of the river corridor could affect this sensitive species.*

MDT examined the potential effects of this project on threatened or endangered species that may occur in the area. The biologists who prepared the Biological Assessment for threatened and endangered species concluded that this project is not likely to adversely affect wolves. The EA recognizes on page 38 that individual wolves (most likely incidental or dispersing animals) could be temporarily disturbed or displaced by construction activities. The point is also made in the EA that the high level of human activities occurring near the bridge makes potential habitat less desirable than in the other areas with fewer disturbances.

These conclusions were made on the basis of coordination with concerned wildlife management agencies and specialists.

- 6) *Page 30 mentions use of well water by Parma residents. However, this document does not describe the critical details. A large, high-quality community well exists immediately downstream from the proposed construction site. The depth of the well reaches slightly below the river. How can you be sure that punching holes in the river bottom for the bridge piers won't increase the mixing between the dirty river water and*

the ground water?

Well logs for the Parma Homeowners Association well and boreholes drilled for the proposed bridge were obtained from the online Groundwater Information Center (GWIC) maintained by the Montana Bureau of Mines and Geology. The well logs provide information on the total depths of drilling for each well and listed static water levels for the well and the bridge boreholes. The well log information was reviewed to obtain a general comparison of the depths to groundwater between the bridge site and domestic well. The well for the Parma Subdivision is more than 400 feet away from the Middle Fork.

According to the logs, the Parma Subdivision well was drilled to a total depth of 199 feet and the static water level was 141 feet below the surface elevation at the time of drilling. Using mapping generated for this project it was possible to determine that the static water level for the well was at an elevation of about 3,711 feet with a pumping water level elevation of about 3,675 feet. The elevation of the river bottom at its lowest point along the alignment for the new bridge is approximately 3,734 feet. The tips of the drilled shafts would extend some 55 feet below the river bottom to approximate elevations of 3,678 feet well into bedrock. The well logs for the bridge bore holes show static water levels at depths ranging from about 29 to 49 feet below the river bottom (elevations ranging between about 3,705 feet to 3,685 feet).

The terrain and geology of the project area suggest that the general direction of groundwater movement is toward the river and downstream. The comparison of static water levels suggests that the domestic well has a higher static water elevation than at the bore holes. If this condition exists, it is unlikely that groundwater from beneath the river would move from the river upgradient toward the Parma well. It should be noted that detailed monitoring of the groundwater conditions would have to be done to verify this contention.

The use of drilled shaft piers minimizes the potential for river water to mix with groundwater. Steel casings for drilled shaft piers would be driven into the river bottom. Minor amounts of turbidity would be created during construction as the casing is pounded through sediments in the river bottom. However, the casing would eventually create a tight seal against surrounding materials below the river. The encased area would then be drilled out and water trapped inside the casing would be pumped out to allow for the eventual placement of reinforcing steel and concrete within the casing. In the end, the pier would be totally encased and anchored in bedrock and other materials below the river.

MDT also must apply for and obtain several water quality-related permits before constructing the bridge. The permitting process and agency reviews offer another assurance that surface and groundwater quality would be protected.

What legal recourse would resident have if the well water quality declined in the years after this project?

Based on the construction methods proposed for the bridge, we do not believe there is any likelihood that the water quality of the Parma Homeowners Association well would be adversely affected years after this project is built.

- 7) ***This document does not describe potential traffic noise impacts on retirement homes at Parma that could result from moving the roadway closer to homes.***

MDT did not perform a detailed noise analysis because the project would not cause a significant change in the horizontal alignment of the bridge and it would not increase the number of through traffic lanes. According to MDT's Noise Policy, a significant change in horizontal alignment would occur if the distance between the highway centerline and the noise receiver is halved.

In response to your comment, the hourly noise level [$L_{eq}(h)$] was estimated for a residence in the Parma Subdivision that MDT's mapping shows to be nearest to the proposed bridge. The horizontal distance between the residence and the centerline of the existing bridge was scaled at about 243 feet (74 meters). The horizontal distance between the home and the centerline of the new bridge was estimated to be 177 feet (54 meters). Noise levels were predicted using a nomograph procedure and other inputs were the design hourly traffic volume, design speed, and estimated numbers of vehicles by class (autos, medium and heavy trucks).

The results of the nomograph analysis showed that under existing conditions the $L_{eq}(h)$ noise level is estimated to be 63 dBA. The predicted $L_{eq}(h)$ noise level would increase to about 65 dBA with the proposed bridge location. It should be noted that this analysis assumes flat terrain with no shielding for noise (a worst case). The residences in the Parma Subdivision are located on a bench some 90 vertical feet above the proposed bridge elevation. The proposed shift in alignment could cause some slight attenuation of noise levels if the existing hillside "breaks the line of sight" between the roadway and residences in the subdivision.

This analysis also suggests that the $L_{eq}(h)$ noise levels associated with this proposed project would not exceed the Noise Abatement Criteria (NAC) for Activity Category B of 67 dBA which includes picnic and recreation areas, playgrounds, parks, residences, etc. The alignment shift would also not be expected to cause a substantial increase noise levels (a 10 dBA or more increase over existing levels) at receptors in the project area.

The EA does not analyze how different styles of road cuts or retaining walls might affect traffic noise.

The existing road cut below the Parma residences consists of unconsolidated materials and its stability is suspect. For these reasons, MDT has proposed building a curb and gutter along the roadway to avoid further excavation of the road cut. Special treatment of road cuts or the installation of noise walls to reduce noise would not appear to be a reasonable action in this case because the shift in alignment would not substantially increase noise levels over existing conditions.

- 8) ***I realize that the Park Service has significant legal clout when it comes to preserving recreational and historic sites. So I am not surprised that the FHA and the MDT have taken the path of least resistance by choosing to trash the Forest Service side of the river instead of the Park Service side. But this is an unusual site. The "historical and cultural" value of that tiny and completely ignored Park Service Walton Ranger Station pales in comparison to the Izaak Walton Inn, which will be put at risk of fires***

from tourists using the new river access road. And the recreational value of the open, sunny, sandy beach on the Forest Service side far outweighs the dark, damp little trail access on the Park Service side.

In this instance, the responsibility for preserving recreational and historical sites rests with the MDT and FHWA under *Section 4(f)* of the U.S. Department of Transportation Act of 1966. Highway agencies are obligated under this law to avoid impacts to publicly owned parks, recreation areas, wildlife and waterfowl refuges, and significant historic sites unless there is no feasible and prudent alternative to the use of land from such properties. If impacts are unavoidable, the proposed action must include all possible planning to minimize harm to such properties.

The National Park Service's Walton Ranger Station Historic District is a property listed on the National Register of Historic Places. By law, impacts to this significant historic site must be avoided by MDT unless there is no feasible and prudent alternative to impacting the property. The proposed alignment avoids impacts to the historic district. **Part III: Alternatives Considered** in the EA describes why this crossing location is preferred over other sites.

The project's location was not determined because it is easier to "trash" Forest Service land than land in Glacier National Park. Steep terrain, the existing highway's location, development in the area, and MDT's design parameters limit viable river crossing points to locations near the present bridge. Both Glacier National Park and the Flathead National Forest are important public lands and consideration has been given to protecting these resources and preserving the public's ability to access and use the lands. MDT has and will continue to work closely with both the National Park Service and the U.S. Forest Service on the development and implementation of this project.

Mr. Bonham suggested the following Mitigations:

1) *Build the bridge downstream.*

Building a new bridge downstream of the existing crossing would introduce additional and undesirable curves in the alignment of US 2. Grades on the approaches would likely be steeper than those of the existing highway. Further, this alternative would require substantial amounts of new right-of-way and ground disturbance within Glacier National Park. US 2 would have to be relocated to the east of the Walton Ranger Station Historic District requiring considerable clearing and excavation from the mountainside directly behind the ranger station. The visual impacts associated with clearing and excavation for the new road would cause adverse impacts to the historic site and surrounding lands in the park.

2) *Mitigate potential increased recreation use by giving the Forest Service money to build fire rings and pit toilets. Or don't allow overnight camping.*

MDT does not have the authority to prohibit camping or change the use of the dispersed recreation site. To our knowledge, the U.S. Forest Service has no plans to alter the management of or install improvements at the dispersed recreation site.

Do something creative to hide the entrance to the access road.

Guardrail is being installed along the highway in the vicinity of the approach for access road because roadside slopes are steep and not safely traversable by vehicles that might accidentally leave the roadway. Due to the need to provide the approach to the access road, a break in the guardrail would be provided. We know of no other creative way to hide the entrance to the access road. Hiding the approach for the access road could also compromise traffic safety.

3) Improve fish passage along Essex Creek under Highway 2 and the railroad tracks.

Essex Creek does not fall within the limits of this project.

4) Do something with the guardrails on the upstream side of the bridge to minimize traffic noise impacts on the dispersed recreation site.

The $L_{eq}(h)$ noise levels at the dispersed recreation site (in the vicinity of the put-in/take out area) were predicted in the same manner as those for the residence in the Parma Subdivision. This procedure yielded an $L_{eq}(h)$ noise level of about 60 dBA for the current bridge location and 63 dBA for MDT's proposed bridge location. It should be noted that the results of this analysis represent a worst case (assumes the road and recreation site were on approximately the elevation). Measured noise levels would likely vary due to the difference in elevation between the elevated bridge site and the riverside area. The analysis again does not suggest that noise levels would increase substantially with the shift in the bridge's alignment.

The use of a continuous and solid concrete barrier rail would offer the most attenuation of traffic noise. However, in the absence of notable noise impacts, such a feature would not appear to be warranted.

5) Analyze noise impacts for various treatments of the cut bank below Parma residences, make choice based on noise impacts rather than costs.

Please review the response to your comment number 7.

6) Provide funding for monitoring water quality at the Parma community well and identify any impacts identified by monitoring.

MDT does not believe there would be any short-term or long adverse impacts to the water quality of the Parma Homeowners Association community well.

RECEIVED

APR 03 2000

March 30, 2000

ENVIRONMENTAL

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Post-it* Fax Note	7671	Date	4-3-00	# of pages	3
To	DAN WILSON		From	TERRY Y	
Co./Dept.			Co.		
Phone #			Phone #		
Fax #			Fax #		

Re: BR1-2(85)180-

Dear Mr. Yarger

I am submitting these written comments on your recently distributed Environmental Assessment and 4(f) Evaluation for the proposed Middle Fork Flathead River - SE Essex Bridge Project. Please contact me if I have submitted these comments to the wrong person, or during the wrong time frame to be considered as officially submitted written comments.

UNADDRESSED IMPACTS:

- 1) This document does not address potentially significant impacts on the dispersed recreational area on the Forest Service side of the river. This site has high recreational value due to the large sandy beach, easy river access, excellent views of a heavily-used big game feeding area on the Scalplock Mountain, and because it is a badly-needed escape from the crowded, overly-regulated National Park. The quiet, secluded nature of this site exists only because the vehicle access to the area is nearly invisible to 65-mph tourists. The Preferred Alternative could significantly alter this condition by making the vehicular access into an obvious break in the guard rail which would be visible as people as they drive across the bridge. You only have to drive a few miles east to see the heavy recreational use that occurs at visible river access points. Impacts from significantly-increased recreational use would include garbage, noise, and human feces from the lack of toilet facilities at this site. Additionally, the lack of campfire rings at this site would significantly increase the fire risk for the historic Izaak Walton Inn and the residences in the Parma subdivision. Dense vegetation leading up a steep hillside from these unprotected campfire sites to the Izaak Walton Inn is an accident waiting to happen. A wildfire racing up this hill to the historic Inn and residences would happen much too quickly for fire crews to respond.

- 2) This document does not provide sufficient information to analyze potential effects on increased recreational use. I couldn't tell exactly where the new access road would be, nor how visible it would be to vehicles on Hwy 2.
- 3) Increased recreational use of this site would increase the fishing pressure at the mouth of Ole Creek, which your document correctly identifies as a staging area for endangered spawning bull trout. It could also increase disturbance of the Harlequin Duck feeding area along the rocks on the Park Service side immediately downstream from the bridge. Harlequins also use the mouth of Ole Creek. Locating the access road further downstream than the current location could greatly increase recreational use and fishing pressure at the mouth of Essex Creek. Currently, tourists don't typically walk downstream from the recreation site because that area is visibly blocked by the bridge. The Preferred Alternative would make this sensitive riparian area much more visible and accessible to disturbance.
- 4) This visual quality and noise levels at this important recreational site would also be significantly impacted by moving the bridge much closer to the sandy beach. The photograph and simulation on page 21 attempt to show visual impacts. But these are views from the Park Service side, which is of relatively no importance compared to the Forest Service side. The Park Service side is a dark, damp, mosquito-infested parking lot, with lousy river access, and it is only used by hikers who are accessing the back country. These hikers do not use the bridge vicinity at all. The Forest Service side, with its beautiful campsites and sandy beach, would experience significantly increased traffic noise, and the views of the elk and grizzlies on Scalplock would be partially blocked by the new bridge.
- 5) This document does not analyze potential temporary impacts on the dispersion of endangered wolves along the Middle Fork River corridor. Both construction activity and increased recreation in this narrowed stretch of the river corridor could affect this sensitive species.
- 6) Page 30 mentions use of well water by Parma residents. However, this document does not describe the critical details. A large high-quality community well exists immediately downstream from the proposed construction site. The depth of the well reaches slightly below the river. How can you be sure that punching holes in the river bottom for the bridge piers won't increase the mixing between the dirty river water and the ground water? (If you like, I can provide references to a Federal Highway Project in Black Diamond, Washington where this was a significant concern.) What legal recourse would residents have if their well water quality declined in the years after this project? Your economic analysis on page 26 shows how difficult it would be for local residents to afford additional water quality monitoring, let alone launching a legal claim against state and Federal agencies.

- 7) This document does not describe potential traffic noise impacts on retirement homes at Parma that could result from moving the roadway closer to homes. People don't retire to a place like Essex, Montana in order to live next to traffic noise. This document does not analyze how different styles of road cuts or retaining walls might affect traffic noise at Parma.
- 8) I realize that the Park Service has significant legal clout when it comes to preserving recreational and historic sites. So I am not surprised that the FHA and the MDT have taken the path of least resistance by choosing to trash the Forest Service side of the river instead of the Park Service side. But this is an unusual site. The 'historical and cultural' value of that tiny and completely ignored Park Service Walton Ranger Station pales in comparison to the Izaak Walton Inn, which will be put at risk of fires from tourists using the new river access road. And the recreational value of the open, sunny, sandy beach on the Forest Service side far outweighs the dark, damp little trail access on the Park Service side.

SUGGESTED MITIGATIONS:

- 1) Build the bridge further downstream.
- 2) Since the Park Service is way too powerful to ever allow mitigation # 1, build on the preferred alignment, but mitigate potential increased recreational use by giving the Forest Service money to build campfire rings and pit toilets. Or don't allow overnight camping at this site. Or do something creative to hide the entrance to the access road.
- 3) Mitigate impacts on fish by improving fish passage along Essex Creek under Hwy 2 and the railroad tracks. Providing fish passage up Essex Creek would greatly improve spawning areas for cutthroat, and possibly bull trout.
- 4) Do something with the guard rails on the upstream side of the bridge to minimize traffic noise impacts on the dispersed recreation area.
- 5) Analyze noise impacts for various treatments of the cut bank below the Parma residences, and make the choice based on noise impacts rather than cost.
- 6) Provide funding for a monitoring water quality at the Parma community well for a few years after construction, and mitigate any impacts identified by said monitoring.

Thank you for your consideration,



Sharlon L. Willows' April 19, 2000 Letter

On April 20, 2000, MDT Environmental Services received a letter from **Sharlon L. Willows**, C.L.A., Coordinator for the Coalition for Canyon Preservation, Inc. (CCP) with comments on the Environmental Assessment and 4(f) Evaluation. Ms. Willows' comments are shown in ***bold and italic text*** and followed by MDT's response. Please note that page numbers referenced below refer to those in MDT's initial Environmental Assessment made available for public review and comment on March 14, 2000.

No justification for earthquake hazard claim in EA.

The EA claims the bridge is located in an area with significant risk of a serious earthquake. Says who? Where are the scientific references to substantiate this new significant serious hazard on the Middle Fork?

Standard practice throughout the United States, Canada, Puerto Rico, and the Mariana Islands is to design highway bridges to meet the requirements of the American Association of State Transportation Officials' (AASHTO) "Standard Specifications for Highway Bridges." The Federal Highway Administration that provides up to 90% of MDT's project funding, mandates that these requirements be followed.

AASHTO's publication defines the earthquake risk at the bridge site as a 90 percent probability that the acceleration due to a seismic event (earthquake) at this location will not exceed 0.28g during any given 50-year period. The "g" in the previous sentence refers to the acceleration due to gravity, or 9.81 meters per second per second. To comprehend this amount of acceleration, envision a 125-pound person being hit with a 35-pound force.

EA's "Need" to rebuild Essex bridge may be a fraud where MDT/FHWA/Glacier Park and USDA have been collaborating behind the scenes since 1997 outside the NEPA process to arrive at unsubstantiated FONSI conclusions in an improper Section 7 determination. The unsigned Section 7 determination was conducted explicitly contrary to 36 CFR 297.5 where it shall be made in compliance with NEPA. Lead and cooperating agencies held their own exclusive Draft EA review that was not open to the public.

As Part II of the EA indicates, work at the Middle Fork bridge near Essex has been underway since 1994 when MDT initially planned to rehabilitate the structure's deck and make other minor modifications. A news release was issued at that time and the USFS Flathead National Forest and Glacier National Park were invited to become cooperating agencies for the project. NEPA compliance activities (including the preparation of a Categorical Exclusion) for the proposed bridge rehabilitation work.

After MDT made the decision to replace rather than rehabilitate the bridge, a news releases was issued in January 1997 to advise the public of the changed scope of work for the Essex bridge. A duly advertised public meeting on this project was held in Essex on April 10, 1997 to advise the public of the change in project scope and to solicit comments on issues or concerns that should

be addressed in the EA and design

MDT has followed the NEPA compliance procedures outlined in the Memorandum of Understanding (MOU) On Procedures Related to State Highways Over National Forest System Lands signed in 1993 by MDT, the Federal Highway Administration, and the USDA Forest Service Northern Region. The National Park Service-Glacier National Park and the U.S. Fish and Wildlife Service are other Cooperating Agencies on this project. Although a similar MOU does not exist with either of these agencies, MDT has followed the same basic procedures as outlined in the MOU with the Forest Service to involve and obtain useful input.

As Cooperating Agencies, the Flathead National Forest, the National Park Service, and the U.S. Fish and Wildlife Service were provided with an opportunity to review and comment on a "rough draft" working version of the EA. As a courtesy and because of their interest in fisheries issues, the Montana Department of Fish, Wildlife & Parks was also afforded an opportunity to review a "rough draft" EA.

Primary Direct Impacts to Wild and Scenic River foreground and not quantified, disclosed, or mitigated:

(1) Significant Walls of Riprap Fill (p. 21, 39)

The EA and unsigned Section 7 Determination fail to disclose and address the legal definition of "free-flowing" which means existing or flowing in natural condition without... rip-rapping, or other modification of the waterway."

The definition of "free-flowing" (36CFR 297.3) you cite is one of two basic requirements for rivers to be eligible for inclusion in the National Wild and Scenic River System. According to 16 U.S.C. Sec. 1271, the other eligibility requirement is to "possess outstandingly remarkable, scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values."

The determination to include the Middle Fork of the Flathead River as an element of the National Wild and Scenic River System occurred in 1976, some 12 years after the existing bridge was constructed. According to the eligibility criteria described above, the free-flowing status of the river had to be considered prior to including the Middle Fork on the Wild and Scenic River System. Decision-makers at the time obviously found the Middle Fork to meet the eligibility status for a Wild and Scenic River even with the highway bridge in place.

The Wild and Scenic River System classifies eligible rivers according to the extent of evidence of man's activities. River classifications include Wild river areas, Scenic river areas, and Recreational river areas. The reach of the Middle Fork in the project area is a Recreational River area. This classification is assigned to rivers or sections of rivers "that are readily accessible by road or railroad, that may have some development along their shorelines, and that may have undergone some impoundment or diversion in the past." (16 U.S.C. Sec. 1273 (b)) It is important to note the federal management interpretation of the classification criteria for Recreational River areas. According to the Final Revised Guidelines for Eligibility, Classification and Management of River Areas (Federal Register, Volume 47, No. 173, September 7, 1982) these criteria are interpreted as follows:

"Readily accessible by road or railroad." River areas classified as recreational may contain existing parallel roads or railroads in close proximity to one or both banks of the river as well as bridge crossings and roads fording or ending at the river.

"Some development along their shorelines." Lands may have been developed for the full range of agricultural and forestry uses, may show evidence of past and ongoing timber harvest, and may include some residential, commercial or similar development.

"Some impoundment or diversion in the past." There may be some existing impoundments, diversions and other modifications of the waterway having an impact on the river area. Existing low dams, diversion works, riprap and other minor structures will not bar recreational classification, provided the waterway remains generally natural and riverine in appearance.

The Middle Fork in the project area meets (and would continue to meet) these classification criteria since the river is readily accessible by road and railroad, development (the existing bridge, utility installations, Walton Ranger Station, etc.) has occurred along its shoreline, and the waterway has been modified in the past. The proposed bridge replacement would not substantially change the generally natural and riverine appearance of the Middle Fork at the road crossing nor would the project be inconsistent with the other classification criteria for Recreational Rivers.

Any action that could alter the river segment's ability to meet the eligibility and classification criteria for being a Recreational river segment would be considered an adverse impact. In this instance, a bridge with riprap bank protection already exists at this location and the existing structure would be removed when the new bridge is completed and disturbed areas revegetated. The natural characteristics of the river and its long-term recreational use would not be substantially changed by this project. This river segment's ability to meet the eligibility and classification criteria listed in the *WILD AND SCENIC RIVER ACT* would not be substantially changed.

This proposal includes giant 460 foot long riprap walls built beneath the existing and new bridges which has been inappropriately omitted from this assessment. How much total riprap is proposed to be filled into the Wild and Scenic River on both ends of the bridge? What are the dimensions of the two massive walls of riprap shown on page 21?

The 460 feet measurement listed in the initial EA was a linear measurement along the toe of the fill slope for proposed access road to the dispersed recreation site. Riprap must be placed beneath each end of the proposed bridge to protect the supporting structure during high water events. An estimated 250 linear feet of riprap would lie below the ordinary high water mark elevation at this crossing. This total represents combined linear measurements for riprap below the ordinary high water mark beneath the north and south ends of the proposed bridge.

A gabion retaining wall would be constructed between the new access road to dispersed recreation site and the fill slope at the north end of the new bridge. The proposed gabion wall would be built along the "uphill" side of the new access road with its principal purposes being to

stabilize the slope and minimize the access road's encroachment on the river. The proposed gabion retaining wall would have a total length of 21.8 m (71.5 feet) and would have a maximum height of about 3.6 m (11.8 feet) at the rear of the retaining wall. Between 1.8 and 2.1 m (6 and 7 feet) of the gabion wall's height would be visible.

The foundation for the access road would be created using rocks and other road fill material. Some of the rock and soils along the bank where the access road would be built (some of which was placed there during past bridge projects or deposited during previous flood events) would be suitable fill material and could be incorporated into the access road's foundation.

Please also review the material added to **2. Description of the Preferred Alternative** in Part III of this Revised EA.

What is the total riprap proposal necessary for the NEPA/CWA 404 permit process (that was required to be integrated but was not in this EA)?

Fill material placed below the ordinary high water mark of the Middle Fork at this location must be considered and identified for a CWA 404 permit.

This NEPA/Sec. 7 process erroneously fails to consider giant riprap walls to be a serious direct adverse effect to Wild and Scenic River visuals and the free-flowing natural general scene.

The U.S. Forest Service was fully aware of the scope and potential effects of this project when making the Section 7 determination included in MDT's initial Environmental Assessment made available for public review and comment on March 14, 2000. The Section 7 Evaluation issued in 1999 (see APPENDIX B) is presently being reviewed by the USFS and a new version of their analysis and determination is forthcoming. Please also review the response to Comment (1) provided on the previous pages.

The EA fails to disclose this significant adverse effect to Wild and Scenic River values then prematurely and improperly arrives at a FONSI conclusion. The FONSI conclusions are unbelievable and explicitly defy the Wild and Scenic River definition of free-flowing at 36 CFR 297.3 (c).

Please review the responses to similar comments previously provided. The conclusions made by the U.S. Forest Service Flathead National Forest in cooperation with the National Park Service represents their evaluation of whether the proposed project has the potential to alter Wild and Scenic River status of the Middle Fork or the values that make the river eligible for inclusion on the National Wild and Scenic River System. The Federal Highway Administration must evaluate the Section 7 determination, this revised EA, and comments received as a result of the revised EA's circulation to determine if a Finding of No Significant Impact (FONSI) is appropriate for this project.

(2) Gabion Retaining Wall

The EA does not include a NEPA analysis for the access road, retaining wall and riprap bank protection.

We disagree with this assertion. The effects of these proposed developments are described at various location in the EA and *Section 4 (f)* Evaluation made available for public review and comment on March 14, 2000 including: page 29 (Floodplain Impacts); page 30 and 31 (Water Resources and Quality); page 32 (Wild and Scenic Rivers); page 34 (Erosion Control and Seeding); page 35 (Wetlands and Other Waters of the U.S.); page 38 and 39 (Threatened and Endangered Species Impacts - Bull Trout); page 46 (Vegetation Impacts); page 50 (Recreation Impacts); page 51 (Visual Impacts); page 57 (Permit Requirements - 404 permit); and pages 60 and 62 (Wild and Scenic River Impacts).

The U.S. Forest Service Flathead National Forest was able to consider these environmental effects and apply their own decision-making criteria to arrive at their initial Section 7 Wild and Scenic River Determination prepared for this project. As indicated on the previous page, a new Section 7 Determination is expected from the USFS in the near future.

Would this proposed development be apparent to hikers on the Boundary Trail in Glacier National Park?

Yes. The Visual Impact Assessment prepared for this project included an evaluation of visual quality from a viewpoint (Viewpoint 10) identified as an outcrop on the Boundary Trail. The Visual Impact Assessment indicates that the underside of the existing bridge and its supporting structure are clearly visible at this viewpoint. The new bridge and associated development would also be clearly visible to hikers from at least this location on the Boundary Trail. Undoubtedly, there are other locations along the trail near this viewpoint from which the new bridge (as well as the existing bridge) could be seen.

What are the dimensions and appearance of this gabion retaining wall?

The proposed gabion retaining wall would have a total length of 71.5 feet and would have a maximum height of about 11.8 feet (at the rear of the retaining wall). Between 6 and 7 vertical feet of the gabion wall would be visible. The rock used in the gabion wall would be derived from local sources and its color would be similar to outcrops in the area.

(3) Substantial New Road Construction in Floodplain (WSR Corridor)

Section 12 (a) of the WSRA states: Federal agencies shall review...plans under their jurisdiction. Particular attention shall be given to...road construction and similar activities which might be contrary to the purposes of this act. The CCP challenges Lead WSR Agencies to explain how an entire new foreground consisting of a giant riprap wall with another paved road extending throughout the panorama cannot be considered a long term significant effect to what is now wetlands and/or a natural river environment. How convenient this precise Visual Impact Assessment was omitted from the EA.

The U.S. Forest Service was fully aware of the scope and potential effects of this project when making their initial Section 7 determination.

Only the US 2 approaches to the new bridge would be paved. The approaches to the old bridge would be obliterated and graded to match ground contours. Disturbed areas within both Glacier National Park and Flathead National Forest would be revegetated with native plants and seeds selected and planted by the National Park Service. The MDT would contract with and pay the National Park Service to perform this revegetation work.

MDT contends that the natural appearance of this river crossing would not be substantially changed by the installation of the proposed bridge. The U.S. Forest Service and National Park Service apparently also agree with this based on their initial Section 7 determination.

The findings of the Visual Impact Assessment prepared for this project were summarized and presented in the EA. Photo simulations of the new bridge were also included to illustrate visual changes likely to occur as a result of this project. The text on page 50 of the EA indicates that copies of the Visual Impact Assessment were on file with MDT.

Figure 3 (page 21) of EA shows a long new access road being proposed across the entire affected landscape (in conjunction with 460 foot long new massive walls of riprap) that would "encroach slightly on the channel and require the placement of material in or near the river channel" including filling in two wetlands which are jurisdictional contrary to cursory excuses (p. 34-35).

Please review the response to comment (4) which follows.

EA admits a "substantial amount of work" for "construction of the dispersed recreation site on USFS land" (p. 32, 62). The EA does not reveal essential information about this substantial work such as: How long is the new road to be constructed on the west bank of the WSR Corridor? The EA's Project Description hides this new road by erroneously describing it as a new approach (p. 2).

The total length of the proposed access road is about 597 feet based on its beginning at the edge of U.S. Highway 2 north of the new bridge to the point where the new section of access road would join the existing access road. The proposed centerline of the access road segment is shown on Figure 2A (page 17) and its approximate length could be scaled from the drawing. Text on page 20 describes in narrative fashion where the access road would be located.

The text in the last paragraph on page 2 will be modified to read:

A new approach **and a segment of gravel-surfaced road** would be constructed from US 2 to maintain access to the dispersed recreation site on the Middle Fork.

Likewise, the text describing the Preferred Alternative on page 20 will be supplemented with a more precise description of length of the access road segment. The text in the first full paragraph on page 20 will be revised to read as follows:

The proposed US 2 approach for the access road to the dispersed recreation site would be located along the east side of the highway about 90± m (295± feet) from the end of the new bridge. The proposed access road would be 5.0± m (16.0± feet) wide **and would extend approximately 182 m (597± feet) from US 2 down and along the river bank before joining the existing access road.** The foundation for the access road would be created using rocks and other road fill material. Some of the rock and soils that exist along the bank where the access road would be built were placed there during past bridge projects or deposited during previous flood events. This material would be suitable for fill material and could be incorporated into the road's foundation. The access road would ~~and~~ have a gravel surface. The maximum gradient on the new road would be 8 percent.

(4) Jurisdictional Wetlands Filled

The discussion on Wetlands is cursory and legally insufficient (pgs. 34, 35). Without substantiation, the EA claims "neither (wetland) site was delineated as jurisdictional wetlands according to the 1987 COE delineation methods. Wetland Site 1 is below the ordinary high water mark, subject to frequent inundation, is dominated by black cottonwood saplings typically adapted for life in saturated soil conditions, and clearly meets the definition of wetlands in the COE 1987 Manual.

Waters of the United States, which include wetlands and other special aquatic sites, are protected and regulated under the Clean Water Act. In accordance with Section 404 of the Act, the Corps of Engineers has administrative authority to regulate dredging or the discharge of fill material in these Waters. Jurisdictional wetlands are Waters of the United States that have specific diagnostic characteristics including:

Hydrophytic vegetation: a prevalence of vegetation that has the ability to thrive and reproduce in saturated soil or flooded conditions;

Hydric soils: soils that have developed primarily in a bio-chemically reducing (anaerobic) environment; and

Wetland hydrology: permanent or periodic inundation at water depths less than or equal to 6.6 feet or saturated soil to the surface at some time during the growing season of the prevalent vegetation.

Wetlands that lack one or more of the wetland characteristics identified above are considered to be non-jurisdictional. Wetlands that meet these three characteristics are considered jurisdictional wetlands. The interpretation of soils, hydrology, and vegetation based on data collected during detailed field work was used to determine the jurisdictional status of wetlands located in the project area.

Testing at Wetland Site 1 did not identify hydric soils. The soils in this site consisted of alluvium (unconsolidated cobbles, sand, etc.). For this reason, the site is considered non-jurisdictional.

Why isn't the wetlands survey (June 1997) attached to the EA?

The results of the wetlands survey were identified and presented in the EA.

What vegetation in the saturated and inundated Site 2 supposedly does not exhibit wetland parameters?

It was the determination of the biologist charged with evaluating wetlands that the small-winged sedges and other facultative plants present in Wetland Site 2 do not meet the parameters for comprising hydrophytic vegetation. Wetland hydrology is present within the site but hydric soil characteristics are variable.

CCP contends this superficial wetland assessment; and obviously, compensation mitigation for wetland impacts are required.

We disagree with your contention. A qualified biological resources consultant conducted the wetlands inventory for this project. As indicated above in a previous response, the sites evaluated as part of the inventory exhibited some, but not all, of the characteristics of jurisdictional wetlands based on the Corps of Engineers 1987 delineation methods.

The EA fails to disclose that riparian wetlands are used as spring feeding habitat for bull trout to escape from flood conditions.

MDT prepared an evaluation of the impacts of this proposed bridge replacement on bull trout in this reach of the Middle Fork of the Flathead River in 1998. The evaluation discussed the presence of bull trout in the Middle Fork and their use of habitat in the vicinity of this project.

Special aquatic sites such as riparian wetlands & floodplains make up "outstandingly remarkable values" of this river environment. How many mature cottonwood trees will be cut down?

The exact number of mature cottonwood trees that would be cut down for this project is unknown. Virtually all trees and riparian vegetation would be removed in the area northeast of the new bridge to construct the US 2 approach and new segment of access road down the river bank to the dispersed recreation site on U.S. Forest Service land. This vegetation removal is necessary to accommodate the placement of fill for the new road and to place the gabion retaining wall. Additionally, trees and riparian vegetation would have to be cleared on an estimated 0.11 acres beneath north end of the new bridge. Few large trees exist on the bank area where the new south end of the bridge and highway approach would be constructed.

The EA admits this major federal action is "Likely to Adversely Affect" the threatened bull trout, so why is this maximized removal of riparian vegetation being advanced in the first place (EA p. 41)?

The bridge replacement is being proposed for the reasons discussed in the Purpose and Need section of the EA. Removing some riparian vegetation and affecting habitat for bull trout is an

unavoidable consequence of this action. MDT and FHWA have initiated formal consultation with the U.S. Fish and Wildlife Service regarding the potential impacts of this project on bull trout and important habitat for the species. The expected outcome of this process is a set of conservation recommendations that would enable MDT to proceed with the project but reduce or possibly eliminate potentially adverse effects to the species and important habitat.

(5) Foreground Visual Impacts from River Rafting Views Missing from EA

The Visual Impact Analysis (VIA) prepared for MDT by a consulting landscape architectural firm in November 1997 is not available for review (EA, p. 50). How can Visual Impacts be assessed, commented and concluded upon when the actual assessment is not available for review?

A full color copy of the Visual Impact Assessment was transmitted to Ms. Willows on May 25, 2000.

The EA talks about "minor impacts" from the driver's perspective, or from a long distance view away upriver (p. 51, 52, 21). However, the "foreground landscape of the project for users of the facility" is not the primary visual impact concern. Instead, what is the visual impact for rafting recreationists as they pass beneath the propose bridge, new access road, and massive riprap walls? What is the foreground visual landscape for river users of these developments per se?

The existing and probable future foreground visual landscape for river users is depicted with reasonable accuracy in Figure 3 (Photo Simulation #2). Readers were referred back to this Figure on page 51 of the EA. The visual landscape for those in rafts floating beneath the bridge would be dominated by views of the bridge, structural members beneath the bridge deck, and its piers. The new bridge would require one less pier in the river channel than the present structure. The riprap bank protection, access road to the dispersed recreation site, and the gabion retaining wall would also be seen from the river. The text of the EA will be modified to include a discussion of what river users would see.

Question Use of Urban Curb and Gutter as incompatible with outstandingly remarkable natural scenery. MDT should explain the proposed use of urban design at one approach to the bridge when the "general scene" is heavily forested and largely undisturbed mountainous terrain.

MDT has proposed installing approximately 665 linear feet of curb and gutter and along the west side of U.S. Highway 2 adjacent to an existing road cut. As shown on page 17 of the EA, MDT's proposed design would also include the placement of about 230 linear feet of concrete median rail behind the guardrail along the west side of the roadway. The road cut lies between residences in the Parma Subdivision and the north end of the existing bridge. The road cut below the Parma residences consists of unconsolidated materials and its stability is suspect.

Because the proposed alignment for U.S. Highway 2 and the north end of the new bridge would be shifted toward the cut, further excavation of the cut would be necessary to construct roadside

slopes to typical "rural" standards. Removing material at the bottom of the cut would likely require excavation all the way to the top of the steep slope. There was also a concern that excavating the top of the slope back far enough to keep large cobbles and other materials from falling down the slope and onto the roadway would affect residential properties and existing structures in the Parma Subdivision.

For these reasons, MDT has proposed building a curb and gutter along the roadway to avoid further excavation of the road cut. The proposed concrete median rail behind the guardrail along the west side of the road would help prevent loose materials falling from upper portions of the cut from reaching the highway.

The Park's Connected Actions have been omitted contrary to NEPA requirements @ 40 CFR 1508.25(a)(1)(2)

Both MDT and NPS have major federal actions proposed for the same area that are being "piecemealed" into separate EA's. "The NPS is currently considering parking and trailhead facility improvements adjacent to Walton Ranger Stationpreliminary site work for the improved NPS parking, trailhead, information, and stock facilities at Walton could be done by MDT's Contractor in conjunction with the contractor's use of the site as a construction staging area." (p. 54). See p. 61-62 for the Park's adjoining development area for which no EA is available yet.

Connected actions are discussed in § 1508.25 (Scope) of the *COUNCIL ON ENVIRONMENTAL QUALITY* (CEQ) Regulations. According to § 1508.25 (a) (1) of the CEQ Regulations, actions are connected if they:

- 1) automatically trigger other actions which may require environmental impact statements (or assessments);
- 2) cannot or will not proceed unless other actions are taken previously or simultaneously; or
- 3) are interdependent parts of a larger action and depend on the larger action for their justification.

The CEQ Regulations indicate that if any of these conditions are met, "connected actions" exist and the closely related actions must be discussed in the same impact document.

MDT's proposed bridge replacement and the NPS's proposed parking and trailhead improvement project at Walton are not "connected actions" as described under the CEQ Regulations. Although these projects occur in the same general area and MDT and the NPS have coordinated progress on their respective projects with one another, the planning, design, and implementation of each project could certainly proceed independently.

Building a new bridge across the Middle Fork at this location would not "trigger" the need for improving trailhead facilities or a new parking area at Walton. MDT's provision of a new bridge at this location would not increase the use of facilities at Walton or cause visitation levels in Glacier National Park to rise. The bridge replacement project would, however, make travel to and

from destinations in the park safer for visitors and other road users. The NPS has proposed the project at Walton because the lack of formalized parking for vehicles with horse trailers has resulted in damage to roadside vegetation and because visitor orientation facilities are considered inadequate. Improving parking, trailhead, and visitor orientation facilities at Walton does not dictate that MDT must build a new highway bridge at this or any future time.

During the development of the environmental assessment for the improvements at Walton, the NPS and MDT discussed the possibility of using the area where the parking facilities would be built as a staging area for MDT's contractor. However, due to uncertainties about the timing and implementation of MDT's bridge project and the NPS's project, the use of land at Walton by MDT's contractor was dropped from consideration.

The material quoted in your comment above and referenced to page 54 of the EA is not a direct quote. Text from two separate paragraphs has been put together differently to provide this interpretation of what the text actually says.

The NPS advised MDT of the proposed parking and trailhead improvement project early in 2000 and recommended that some discussion of the proposed project be added to the EA as a cumulative impact. Although preliminary planning for the Walton area has occurred, the proposal and environmental assessment was being reviewed by the NPS at the time MDT's initial EA was released. The implementation of the NPS's proposed project at Walton will depend upon the completion of an environmental assessment by the agency and securing funds for the project. Contacts with the NPS during February 2001 indicate that the agency has suspended work to implement the project at Walton. The likely timeframe for the NPS to complete its environmental compliance requirements and build the proposed improvements at Walton would be after MDT's bridge project is completed.

It should be noted that the NPS made its Environmental Assessment for the Walton Area Plan available for public review and comment on September 8, 2000. A revised version of the document was issued by the NPS on December 19, 2000 and public comments were due on January 26, 2001. MDT disclosed what was known about the Walton project at the time the initial EA for the proposed bridge replacement project was made available for public review.

Water Quality Issues/MPDES

The proposed bridge will have 16 feet of shoulder instead of 6 ft of shoulder to plow in the winter in a heavy snow area. Is MDT prepared for the additional snow plow maintenance responsibility (2-4 more trips across the bridge will be necessary to clear snow)?

MDT realizes and accepts the fact that the new bridge deck would be wider and require additional snowplowing.

Where is the highway runoff from the bridge and the 1,300 feet of approaches going? This should be addressed and mitigated in the EA. Discharging directly into the designated WS River is unacceptable as water quality is a protected value here. Water Quality is Class A-1. This drainage is one of the cleanest in the world. Polluted

highway runoff should go into a cattail pond for purification and assimilation; then possibly be discharged.

As currently done, the majority of the runoff from the highway would be transported overland via vegetated roadside ditches to eventually discharge into the Middle Fork. Vegetation in roadside ditches would help attenuate pollutants in highway runoff.

The runoff from the west end of the bridge would go to a small settling pond under and to the down stream side of the bridge, formed by fill material for the access road. The grade on the south end of the bridge slopes away from the river and would move runoff in that direction. Runoff from the bridge itself would fall directly into the river, a standard practice for bridges designed in Montana and elsewhere. Drainage systems that have been used on bridges are typically very expensive and do not work well. Drainage pipes have a tendency to become plugged by sand from the roadway causing the system to no longer function.

The runoff from a bridge this size would contain levels of contaminants so low that they would have little or no effect on receiving waters. According to an article from the National Cooperative Highway Research Program's *Research Results Digest* titled "Assessments of Impacts of Bridge Deck Runoff Contaminants on Receiving Waters" (January 1999, p. 7):

".... it was concluded that runoff from rural highways with Average Daily Traffic (ADT) less than 30,000 vehicles per day would not adversely affect aquatic biota."

The "projected" ADT for the year 2010 at this location is only 1,790 vehicles per day. Based on this, there is no justification for installing an elaborate drainage and treatment system for runoff from the highway and bridge.

Please send the Public Notice for this EA pursuant to 23 CFR 771.119(f).

The notice was provided to the CCP in early June.

10 Kyle Mander
Joe Talmann
Coalition for Canyon Preservation, Inc.

P.O. Box 422

Hungry Horse, Montana 59919-0422

Dedicated to the Protection of the Flathead Wild & Scenic River System

April 19, 2000

Joel Marshik, P. E.
MDT Environmental Services Mgr.
2701 Prospect Ave.
Helena, MT 59620-1001

RECEIVED

APR 20 2000

ENVIRONMENTAL

Attn: CN 1763 Middle Fork Flathead Essex Bridge EA
(plus major WSR Road/Riprap Wall Developments) -
Individual 404 permit required with public review.

Dear Joel,

Please enter these comments into the official public record for the cited EA for.

No Justification for Earthquake Hazard Claim in EA

The EA claims the Bridge "is located in an area with significant risk of a serious earthquake" (p. 2). Says who? Where are the specific scientific references to substantiate this new "significant serious" hazard on the Middle Fork? Flathead County Emergency Managmt. Services (Deputy Dir. EMS, 4/17/00) had no such hazard listed on their maps from MT Bureau of Mines.

The EA's "Need" to rebuild Essex bridge may be a fraud where MDT/FHWA/Glacier Park/USDA Officials have been collaborating "behind the scenes" since 1997 outside the NEPA process to arrive at unsubstantiated FONSI conclusions in an improper Section 7 Determination (9/22/99, Appendix B). The unsigned Sec. 7 Determination pursuant Wild and Scenic Rivers Act (WSRA) was conducted explicitly contrary to 36 CFR 297.5 where it "shall be made in compliance with NEPA" (Lead & Cooperative Agencies held their own exclusive Draft EA review that was not open to the public).

Primary Direct Impacts to WSR foreground are not quantified, disclosed, nor mitigated :

(1) Significant Walls of Riprap Fill (p. 21,39).

The EA and the unsigned Section 7 Determination (Ap.B) fail to disclose & address the legal definition of "Free-flowing" which "means existing or flowing in natural condition without ...rip-rapping, or other modification of the waterway" WSR Sec. 15(b). This proposal includes giant 460 ft. long riprap walls built "beneath the existing and new bridges" (p. 39) which have been inappropriately omitted from this assessment.

How much total riprap is proposed to be filled into the WSR on both ends of the bridge? What are the dimensions of the two massive walls of riprap shown (p. 21)? This NEPA/Sec.7 process erroneously fails to consider giant riprap walls to be a serious direct adverse effect to WSR visuals, and the free-flowing natural general scene. What is the total riprap proposal necessary for the NEPA/CWA 404 permit process (that is required to be integrated, but was not in this EA)?

The EA fails to disclose this significant adverse effect to WSR values; then prematurely & improperly arrives at a FONSI conclusion (p. 32, 62 - no longterm significant adverse effects on free-flowing values or the WSR setting) ! The FONSI conclusions are unbelievable and explicitly defy the WSR definition of "free-flowing" @ 36 CFR 297.3(c).

(2) Gabion Retaining Wall

The EA admits "substantial amount of work along the west bank of the Middle Fork" (p. 32,62). However, the EA does not include a NEPA impact analysis for: "The access road, a gabion retaining wall, and riprap bank protection would be apparent to floaters on the Middle Fork" (p. 32). Would this "substantial" incompatible development also be apparent to "hikers on the Boundary Trail located along the river in Glacier National Park" (p. 51)? This "substantial work" has been essentially omitted from the NEPA analysis.

"A retaining wall made of rock held in place by rectangular wire mesh baskets (gabions) would be constructed between the abutment spill slope and the proposed new river access road to minimize fill in the river" (p. 51). What are the dimensions & appearance of this gabion retaining wall? How can the EA arrive at

FONSI conclusions (p. 32,62) when no details about the wall are provided?

(3) Substantial New Road Construction in Floodplain (WSR Corridor)

Sec.12(a) of WSR states: "Federal agencies shall review...plans under their jurisdiction. Particular attention shall be given to ...road construction and similar activities which might be contrary to the purposes of this act." The CCP challenges Lead WSR Agencies to explain how an entire new foreground consisting of a giant riprap wall with another paved road extending throughout the panorama cannot be considered a longterm significant effect to what is now wetlands and/or a natural river environment! How convenient this precise Visual Impact Assessment was omitted from the EA.

Fig. 3(p.21) of EA shows a long new access road being proposed across the entire affected landscape (in conjunction with 460 ft.long new massive walls of riprap) that would "encroach slightly on the channel and require the placement of material in or near the river channel" (p. 39) including filling two wetlands which are jurisdictional contrary to cursory excuses(p.34-35).

EA admits a "substantial amount of work" for "construction of the proposed access road to the dispersed recreation site on USFS land" (p. 32,62). The EA does not reveal essential information about this "substantial work" such as: How long is the new road to be constructed on the west bank of the WSR Corridor? The EA's Project Description "hides" this new road construction by erroneously describing it as a "new approach"(p.2).

(4) Jurisdictional Wetlands Filled

The discussion on Wetlands is cursory and legally insufficient (pgs. 34,35). Without substantiation, the EA claims "neither (wetland) site was delineated as jurisdictional wetlands according to the 1987 COE delineation methods".

Wetland Site 1 (1.6 ac.) is below the ordinary high water mark, subject to frequent inundation, is dominated by black cottonwood sapplings typically adapted for life in saturated soil conditions, & clearly meets the Federal Register definition of wetlands in the COE 1987 Manual (p. 13). Why isn't the wetlands survey (June 1997) attached to the EA? What vegetation in the saturated & inundated Site 2 supposedly does not exhibit

wetland parameters? CCP contests this superficial wetland assessment ; and obviously, compensation mitigation for wetland impacts are required.

The EA fails to disclose that riparian wetlands are used as spring feeding habitat for Bull Trout to escape from flood conditions (MDFWP/Weaver Region One). Special aquatic sites such as riparian wetlands & floodplains make up "outstandingly remarkable values" of this river environment. How many mature cottonwood trees will be cut down? The EA admits this major federal action is "Likely to Adversely Affect" the threatened Bull Trout, so why is this maximized removal of riparian vegetation being advanced in the first place (EA, p. 41) ?

(5) Foreground Visual Impacts from River Rafting Views Missing from EA

The Visual Impact Analysis (VIA) prepared for MDT by a consulting landscape architectural firm in November 1997 is not available for review (EA, p. 50). How can Visual Impacts be assessed, commented & concluded upon when the actual assessment is not available for review?

The EA talks about "minor impacts" from the driver's perspective, or from a long distance view away upriver (p.51,52,21). However, the "foreground landscape of the project for users of the facility" is not the primary visual impact of concern.

Instead, what is the visual impact for rafting recreationists as they pass beneath the proposed bridge, new access road & massive riprap walls? What is the foreground visual landscape for river users of these developments per se ?

Question Use of Urban "Curb & Gutter" at WSR (p. 2) as Incompatible with Outstandingly Remarkable Natural Scenery

MDT should explain the proposed use of urban design (curb & gutter) at one approach to a WSR bridge when the "general scene" is "heavily forested and largely undisturbed mountaineous terrain"(p.1): "The approach work north of the new bridge would include the installation of curb and gutter along the west (Essex) side of the road. The use of curb and gutter at this location would avoid excavation of a steep and somewhat unstable existing roadside slope." Apparently other slopes are "somewhat unstable" to warrant the massive 460 ft. long Super Riprap Walls proposed to be built under the new and existing bridge which haven't been assessed

in the Sec. 7/NEPA process yet (EA barely mentions once, p. 39). Again, riprap is precluded under the WSRA definition of "free-flowing" @ 36 CFR 297.3: "flowing natural without diversion, straightening, riprapping, or other modification".

The Park's "Connected Actions" have been omitted contrary to NEPA requirements @ 40 CFR 1508.25(a)(1)(2)

Both MDT and NPS have major federal actions proposed for the same area that are being "piecemealed" into separate EAs. "The NPS is currently considering parking and trailhead facility improvements adjacent to the Walton Ranger Station...preliminary site work for the improved NPS parking, trailhead, information, and stock facilities at Walton could be done by MDT's Contractor in conjunction with the contractor's use of the site as a construction staging area." (p. 54). See p. 61-62 for the Park's adjoining development area for which no EA is available yet.

Water Quality Issues/MPDES- The proposed bridge will have 16 ft. of shoulder instead of 6 ft. of shoulder to plow in the winter in a heavy snow area. Is MDT prepared for the additional snow plow maintenance responsibility (2-4 more trips across the bridge will be necessary to clear snow) ? Where is the highway runoff from the bridge and the 1,300 ft. of approaches going? This should be addressed and mitigated in the EA. Discharging directly into the designated WSRiver is unacceptable as water quality is a protected value here. Water Quality is Class A-1. This drainage is one of the cleanest in the world. Polluted highway runoff should go into a cattail pond for purification and assimilation; then possibly be discharged.

Please send the Public Notice for this EA pursuant 23 CFR 771.119(f). Respectfully submitted,

 **C.L.A.,** Certified Legal Assistant Administrative Law, CCP Research Coordinator.

CC:

Glacier Park Superintendent

Flathead Nat'l Forest SO & HHRD /File code:2350

USDA Region One/ File Code: 2350/2730

COE **Attn: Individual 404 permit for Riprap Walls on WSR**

FHWA

USFWS

MDFWP

DEQ Attn: NPDES Alternatives to Direct Discharge of highway runoff into the river need to be considered for Flathead Wild & Scenic Rivers System.

Enclosures:

MDT/Weaver to SLW,CLA with false info.about environmental assessment, 1/21/00

CCP Request for access to MDT Wetland Assessment missing from EA 4/18/00

CCP Request for access to MDT VIA missing from EA 4/17/00

36 CFR Part 297 Wild and Scenic Rivers

Essex Bridge EA Title/Signature page

Sharlon L. Willows' June 13, 2000 Letter

MDT Environmental Services also received a letter from **Sharlon L. Willows, C.L.A.**, Coordinator for the Coalition for Canyon Preservation, Inc. (CCP) dated June 13, 2000 with comments on the Visual Impact Assessment (VIA), Wild and Scenic River effects, and the 1993 Memorandum of Understanding on Procedures Related to State Highways Across National Forest System Lands. Ms. Willows' substantive comments are shown in *bold and italic text* and followed by MDT's response.

Why is the VIA for a Wild and Scenic River a big secret, not distributed to Cooperating Agencies, not available for public comment, and not included in the NEPA/MEPA process?

Preliminary review copies of the Visual Impact Assessment Report with photo simulations were transmitted to Bob Dunkley of the National Park Service and Earl Applekamp of the U.S. Forest Service - Flathead National Forest and staff from MDT Environmental Services and Bridge Bureau on August 28, 1997 along with a request for comments. No comments were received on the Visual Impact Assessment Report from either the NPS or the USFS. Robert Peccia & Associates provided review comments and directed Fischer and Associates to complete the report on October 17, 1997.

The findings of the Visual Impact Assessment prepared for this project were summarized and presented in the EA. Photo simulations of the new bridge were also included to illustrate visual changes likely to occur as a result of this project. The text on page 50 of the EA indicates that copies of the Visual Impact Assessment Report were on file with MDT. The report is available for inspection and copying at MDT Environmental Services in Helena.

Please note the 1993 MOU between MDOT/FHWA/Reg. 1 FS (FS01-92-43) provides: "The MDT will Revise the EA in response to the Public comment, in cooperation with the Forest Supervisor" (p.6). Has this commenced yet?

MDT's consultant is currently in the process of responding to public comments received as a result of the EA's circulation. The responses to the comments have yet been provided to the USFS or the NPS pending review by MDT staff. These Cooperating Agencies will be provided with a revised copy of the EA showing text changes, public comments received, and MDT's responses to substantive comments.

The 1993 MOU between MDT and Forest Service is obviously outdated when this process conducted a secret WSR Section 7 Determination process on a "draft preliminary EA" which has never been made available to the public. The Section 7 Determination should obviously be based on "all necessary information" and/or on analysis that was not preliminary/had been subject to public NEPA process (see 1993 MOU. p.3). At present, based on FOIA responses, neither Flathead National Forest nor Region One FS has a copy of the draft preliminary EA in their project files. Please send a copy.

Throughout the development of this proposed project, MDT has diligently attempted to keep the USFS, NPS, USFWS, and other interested agencies up to date on its scope and potential environmental effects. MDT afforded the NPS (Bob Dunkley), USFS (Earl Applekamp), USFWS (Dale Harms), and MDFWP (Dan Vincent c/o Scott Rumsey) with opportunities to review a "rough draft" version of the EA. According to our consultant's files, copies of this preliminary environmental document were sent to these agencies on June 18, 1999. Three additional copies of the "rough draft" EA were also provided to Bob Dunkley of the NPS on July 1, 1999. MDT also met with Cooperating Agencies on several occasions during the project, including February 6, 1998 and September 17, 1998. MDT's preliminary plans for the project (including the proposed plans for a new section of access road to the dispersed recreation site) were presented to staff from both the NPS and USFS Flathead National Forest at the September 1998 meeting.

The Section 7 Determination for this project was drafted by the USFS Flathead National Forest in September 1999 and transmitted to MDT by the USFS Region One office on December 14, 1999. It is evident, based on the dates of Cooperating Agency meetings and transmittal of the "rough draft" EA to the USFS, that current information about the bridge replacement project was available for consideration by the USFS prior to the issuance of its initial Section 7 Determination. The USFS is presently reviewing its initial determination and is expected to issue a new Section 7 Determination for this project in the near future.

The "rough draft" Environmental Assessment provided to Cooperating Agencies is a preliminary document. MDT and the FHWA consider preliminary and pre-final environmental documents (those documents not yet released to the public under NEPA) to be intergovernmental exchanges that may be withheld under a FOIA request.

The 1993 MOU will be reviewed every 5 years (p.2) - has this requirement been fulfilled?

Yes, the 1993 MOU is presently being re-negotiated. To date, several agency meetings have been held to review the existing MOU and discuss potential revisions. Some compelling issues, like wildlife connectivity and habitat fragmentation, have prompted agencies to take a new look at the MOU procedures. Whether or not the MOU will be amended or supplemented and when the MOU review process will be completed are presently unknown. Additional information on the status of the MOU may be obtained by contacting Sandra Straehl, MDT's Program and Policy Analyst at (406) 444-7692.

Obviously, a necessary "Corridor Management Plan" has not been prepared (for this Flathead WSR Corridor) as required by MOU (p. 13). The CCP hereby requests a dire need for the Corridor Plan for MDT CN 1763 and CN 1290.

Although the MOU calls for a corridor management planning, MDT has not developed any Corridor Management Plans for highways crossing National Forest lands. The concept of corridor planning came out of highway reconstruction projects through the Seeley-Swan area during the 1980's. The USFS and MDT agreed that corridor management planning could have alleviated many of the issues that were concerns to both agencies on these projects. However,

since the signing of the 1993 MOU, the USFS has not actively advocated that MDT complete corridor management plans for all state highways crossing National Forests. This is likely one of the issues to be "revisited" as the review of the existing MOU progresses.

The MOU does not provide for necessary public involvement on transfers/acquisitions of WSR Corridor lands now being conducted in secret (i.e. MDT CN 1763 & 1290).

Public involvement activities were conducted for this proposed project in accordance with NEPA and MEPA. The comments received through this process (along with MDT's responses) and final environmental documents will be made available to the USFS, NPS, and the public prior to the acquisition of new right-of-way easements for the project.

VIA does NOT support EA's claim of "minor changes to the foreground" (p. 51) Significant Adverse Longterm Visual Impact to WSR Scenery: (Note - The CCP comment letter contained statements made on forms included with the Visual Impact Assessment regarding proposed visual changes from eight different Viewpoints).

Your comments are noted. Visual impact analyses are based in part on the subjective judgments made by the analyst. Your judgment of the visual effects of this project differs from that of the firm that conducted the visual impact assessment. An experienced and qualified landscape architectural firm performed the visual impact assessment and the procedures used were consistent with the assessment methodologies and guidelines described in the FHWA's *Visual Impact Assessment for Highway Projects* (Publication Number FHWA-HI-88-054). The statements you provide in your letter are comments from evaluation forms prepared by the firm that were considered in reaching the conclusion that the overall visual quality of the area would not be greatly affected by the installation of the proposed bridge. The U.S. Forest Service's initial Section 7 Determination recognized that short-term visual impacts would occur but that the long-term appearance of the area would not be notably different.

The proposed action does not include "two 460 ft x 100 foot high giant riprap walls." As indicated previously, riprap would be placed on the slopes adjacent to each end bent (abutment) to protect the bridge during high water events. A gabion wall would be constructed between the new access road to dispersed recreation site and the fill slope at the north end of the new bridge. The foundation and fill slope for the access road would be created using rocks and other road fill material from the bank area or from similar materials imported to the site by the contractor.

There has been no public involvement on this significant unnecessary WSR Corridor land transfer to the State (6 acres). There has been no public availability of the VIA. MDT's "Immediate Release" (March 27, 2000) notifying the public of availability of EA-and-the public meeting held during work hours 28 miles from civilization did not mention "Wild and Scenic River."

We disagree with your contentions that there has been no public involvement for this project. MDT held a public meeting at the Izaak Walton Inn in April 1997 shortly after work was initiated on the EA and again on April 20, 2000 after the EA had been made available for public review. The EA notice was issued more than three weeks in advance of the public meeting and

the open house meeting was held between 3:30 p.m. and 6:30 p.m. to accommodate those who might be working.

MDT's public notice identified this project's location on the Middle Fork of the Flathead River near Essex. We know of no requirement to mention Wild and Scenic River in our EA notice. Project materials made available at both the April 1997 and April 2000 meetings clearly identified that this bridge replacement was located within and would have effects on the Middle Fork of the Flathead Wild and Scenic River Corridor.

06/18/2000 11:43 406-441-145 MDT ENVIRONMENTAL PAGE 02

Coalition for Canyon Preservation, Inc.

P.O. Box 422

Hungry Horse, Montana 59919-0422

Dedicated to the Protection of the Flathead Wild & Scenic River System

Joel ~~Holtrop~~ ^{Marshik} Env. Unit Mgr.

June 13, 2000

Re: FS 01-92-43 Outdated

MT DEPT. HIGHWAYS/TRANSPORTATION
2701 PROSPECT AVENUE
HELENA, MT 59620-1001

Attn: CN 1763 Middle Fork Flathead Essex Bridge EA (March'00)
Visual Impact Analysis (VIA) does Not support EA's claim of "minor changes to the foreground" & Need for Flathead WSR Corridor Plan (1993 MOU, p. 13).

Dear Joel,

Thankyou for finally sending a response on June 2nd to CCP's Request of 4/17/00 to obtain a copy of the Final VIA (with a charge of \$20.00 !). We see no distribution list. **Why is the VIA for a Wild & Scenic River a big secret, not distributed to Cooperating Agencies, not available for public comment, and not included in the NEPA/MEPA process?** Possibly because the VIA clearly documents Longterm Adverse Impacts to Wild & Scenic River scenery and values. Possibly because there is no Corridor Management Plan for the Flathead WSR as required by 1993 MOU (p. 13). The 1993 MOU does not reflect new MOU between FHWA & FS (June '98). Neither MOU makes adequate provision for public involvement with Flathead WSR issues. **Please consider this a comment on the dire need for a revised MOU between the agencies that represents appropriate WSR regulations @ 36 CFR Part 297.**

Please note the 1993 MOU between MDOT/FHWA/Reg. 1 FS (FS01-92-43) provides: "The MDT will Revise the EA in response to the public comment, in cooperation with the Forest Supervisor" (p. 6). Has this commenced yet?

The 1993 MOU between MDT and Forest Service is obviously outdated when this process conducted a secret WSR Section 7 Determination process on a "draft preliminary EA" which has never been made available to the public. **The Section 7 Determination**

should obviously have been based on "all necessary information" &/or on analysis that was not preliminary/had been subject to public NEPA process (see 1993 MOU, p. 3). At present, based on FOIA responses, neither Flathead National Forest nor Region One FS has a copy of the draft preliminary EA in their project files. Please send a copy. The 1993 MOU "will be reviewed every 5 years" (p. 2) - has this requirement been fulfilled? Obviously, a necessary "Corridor Management Plan" has not been prepared (for this Flathead WSR Corridor) as required by MOU (p. 13). The CCP hereby requests a dire need for this Corridor Plan for MDT CN 1763 and CN 1290. The MOU does not provide for necessary public involvement on transfers/acquisitions of WSR Corridor lands now being conducted in secret (ie. MDT CN 1763 & CN 1290).

VIA does NOT support EA's claim of
"minor changes to the foreground" (p. 51)

Significant Adverse Longterm Visual Impact to WSR Scenery:

* "VP-1 Evaluation of Visual Quality. (New) Bridge more obvious because less of river visible." Draft VIA (Aug. '97), Form-3a.

* "VP-5 at Boat launch. Existing bridge visible but not prominent...work(s) well with landscape. Proposed Bridge will be ... overpowering (to the) site. Proposed Bridge will become more imposing." Forms -2a & -3a.

"VP-6 at South Approach. Proposed Bridge ...More of disrupting elements visible...Most encroachments will become more visible. Natural landforms will be overpowered by new bridge. Less vegetation diversity will be be visible. " Form -3a.

"VP-10 along Boundary Trail. Proposed Bridge...view of cutslopes would increase." Form -3A [Notice: VIA totally omits visual impact analysis for the two 460 ft. X 100 ft. high giant riprap walls proposed for under the new(and old) bridges banks, EA p.21,39].

"VP-11, Road to Isaak Walton Inn. Straightening bridge will create disharmony with other landscape elements. Proposed Bridge and cutslope impart disunity." Forms -2a & -3a.

"VP-3, approx. 300' from N. approach. Cutslope would be more pronounced."

"VP-4, end of guardrail @ N. approach of bridge. Proposed Bridge disrupts continuity of flow of landscape elements; ie. straight vs. curvilinear. (With Proposed Bridge) Contrast between man/natural will increase. New Bridge will destroy intactness, increase area of cutslope,

dominate view, and disrupt visibility of natural features...Bridge will dominate." Forms -2a & -3a.

"VP-8. Center of bridge, northbound. Proposed Bridge (will) decrease downstream view, road and embankment will become more dominant in the fore and middle ground. Less of river visible, more embankment visible." Form -3a.

* * * *

Joel, there has been no public involvement on this significant unnecessary WSR Corridor land transfer to the State (6 acres). There has been no public availability of the VIA. MDT's "Immediate Release" (Mar.27,'00) notifying the public of availability of EA -and- the public notification for meeting held during work hours 28 miles from civilization did not mention "Wild & Scenic River".

MDT'S NEWSRELEASES FOR THIS PROJECT MADE NO MENTION OF SIGNIFICANT WILD & SCENIC RIVER LAND ACQUISITION. CCP respectfully requests a re-evaluation of this proposed significant "eyesore" based on the WSR issues discussed above (and in numerous substantive comments previously submitted). Respectfully submitted,

Sharon L. Willows C.L.A., Certified Legal
Assistant Administrative Law, CCP Research Coordinator. 387-5872

CC: (all FAXed this day) ✓ Denis Davis

Cooperating Agencies: GLAC & (2) FNF/HHRD File Code: 2350/2730
FHWA Helena

Region One FS Attn: M.Prather & G.Morrison File Code: 2350/2730

FAXED to Dan Norderud
6-20-00

Appendix G: Written Agency Comments on the Initial EA and MDT's Responses

US Department of the Interior, Office of the Secretary October 24, 2000 Letter

Written comments on the initial EA were submitted to Janice W. Brown, FHWA's Montana Division Administrator by Willie R. Taylor, Director of the USDO's Office of Environmental Policy and Compliance in a letter dated October 24, 2000. Mr. Taylor's comments are shown below in ***bold and italicized text***. Revisions to the text of the initial EA are shown in a highlighted font style. Please note that page numbers referenced below refer to those in MDT's initial Environmental Assessment made available for public review and comment on March 14, 2000.

SECTION 4(f) COMMENTS

We are concerned that the 4(f) evaluation fails to consider the use of parkland from Glacier National Park. Neither the EA nor the Section 4(f) Evaluation for this project specifically address the loss of NPS Lands. Instead, the evaluations address the project's effects on the Walton Ranger Station Historic District and on the Middle Fork of the Flathead River, as a Wild and Scenic River. The reason stated on page 59 is that the Surface Transportation and Uniform Relocation Assistance Act of 1987 (P.L. 100-17) exempts "roads located within or providing access to National Parks from the provisions of Section 4(f)." We disagree that this provision applies to the proposed highway construction. The language of P.L. 100-17 as codified in Section 303 of Title 49 establishes a limited exemption for park roads or parkways funded under Section 204 of Title 23. Section 204 of Title 23 is the provision establishing funding for the Federal Lands Highway Program. To our knowledge, the proposed project is not being funded under that program.

Based on our review of P.L. 100-17, we concur that Section 4(f) exemption referred to in the EA text is inappropriate. References to this exemption on pages 48 and 59 in the initial EA will be eliminated. MDT will prepare a "Nationwide" Section 4(f) Evaluation for affected Glacier National Park lands and modify discussions in the EA concerning Section 4(f) applicability to NPS lands.

As a result, a Section 4(f) Evaluation must be prepared to cover the lands that you are requesting an easement for from Glacier National Park. Furthermore, for the NPS to consider this request, the EA must analyze the impacts of this project on those lands, and the 4(f) evaluation must be prepared and identify mitigation for this easement request.

We agree that it is necessary to prepare a Section 4(f) Evaluation for Glacier National Park lands. After reviewing the applicability criteria established by FHWA in 1986, we believe it is appropriate to use prepare a Nationwide Section 4(f) Evaluation. The applicability criteria for the use of the "Nationwide" Section 4(f) Evaluation can be found in Appendix D of the EA you

reviewed for this project. MDT will prepare a Nationwide Section 4(f) Evaluation for the impacted NPS lands in Glacier National Park and include the document in its "final" EA. This evaluation would be documented on forms similar to those already prepared for the Walton Ranger Station Historic District and for the Middle Fork of the Flathead Wild and Scenic River.

MDT would also amend the "Nationwide" Section 4(f) Evaluation form for the Middle Fork of the Flathead Wild and Scenic River found in Appendix D of the EA to discuss Glacier National Park lands. The Management Corridor for the Middle Fork of the Flathead Recreational River also includes all of the NPS lands that would be affected by this bridge replacement project. The description of the Middle Fork Recreational River provided on page 1 of the current "Nationwide" Section 4(f) Evaluation correctly indicates joint management responsibility for the Wild and Scenic River (WSR) Corridor. Although the text indicates the amount of Flathead National Forest land within the WSR Corridor, the area of NPS lands within the Corridor affected by the project is not discussed. This will be remedied by adding text to the description referring to the 3.07 acres of NPS land needed. The revised form would be included in the "final" EA.

Please note that the text of the EA is intended to (and does) support the analysis of effects on Section 4(f) properties. Due to the nature of the evaluation forms, references are made to portions of the EA where additional information can be obtained (i.e. alternatives considered).

We are aware that your office must agree in writing with the assessment of impacts and proposed mitigation for effects to Section 4(f) lands in Glacier National Park. We are committed to addressing the comments you provided on the EA and working with the NPS to ensure the effects on 4(f) lands in Glacier National Park are suitably mitigated. A meeting between MDT, FHWA and staff from Glacier National Park was held on November 3, 2000 in Helena to discuss 4(f) issues, impacts, and mitigation ideas. As a result of that meeting, involved agencies agreed in principal to the extent of 4(f) impacts on Glacier National Park lands and to measures that MDT can implement with this project to mitigate the identified 4(f) impacts.

Furthermore on page 25 the document references both a right-of-way and an easement that would be required from Glacier National Park. Please clarify what you are seeking from Glacier National Park, as the procedures for processing these requests are different.

MDT is seeking to obtain an easement across Glacier National Park land for highway purposes. According to a 1988 "Letter of Authorization" from Glacier National Park, the area presently occupied by US 2 within Glacier National Park is not part of a formal easement or dedicated right-of-way. Instead, MDT has been authorized by the NPS to operate and maintain US 2 on about 2.10 acres of Glacier National Park land within the project area. Considering the area of this existing authorization and MDT's anticipated right-of-way needs of 3.07 acres, this proposed project would increase the total area devoted to US 2 within the Park by some 0.97 acres.

Both the EA and Section 4(f) Evaluation fail to indicate what lands would be returned to Glacier National Park in return for the easement or right-of-way. If the roadway is moved away from the Walton Ranger District, these lands could then become federal

lands managed and owned by the NPS. The final EA must address the disposition of these lands.

The 3.07 acres of easement area being requested would include a portion of the existing authorized area for US 2 and additional NPS land required for the construction of the new bridge and its easterly approach. MDT only had authorization to maintain US 2 across Glacier National Park at this location never held legal interest in the lands. Therefore, technically, these lands cannot revert back to the park. However, 0.54 acres of park lands previously occupied by the highway would no longer be needed for the US 2. These lands would be restored to a natural condition.

ENVIRONMENTAL ASSESSMENT COMMENTS

Page 31 indicates that the entire project falls within the Wild and Scenic River corridor. However, the analysis in the EA and Section 4(f) Evaluation do not include the park lands that fall within the Wild and Scenic River corridor as well. These lands must be included in the EA as well as the Section 4(f) Evaluation on the Wild and Scenic River.

In response to your comment, the text on page 32 of the EA will be revised to identify that the Wild and Scenic River corridor includes both Flathead National Forest and Glacier National Park lands. The highlighted sentence below will be added to the first full paragraph on page 32:

Within the project area, the Middle Fork of the Flathead River is designated as a Recreational River. The USFS has also designated a Management Corridor (shown in **FIGURE 4**) for the Middle Fork Recreational River. Lands from both Flathead National Forest and Glacier National Park are included in the Management Corridor at this location. The USFS Flathead National Forest is the lead agency for the management of the Middle Fork of the Flathead Wild and Scenic River corridor.

FIGURE 4 will also be modified so the reader can clearly identify that a portion of Glacier National Park lies within the Wild and Scenic River corridor.

Additionally, the highlighted text below will be added to the first paragraph under **Impacts of the Preferred Alternative** on page 32:

The proposed action would cross the Middle Fork of the Flathead Wild and Scenic River Corridor in the SW¹/₄ of Section 14 in Township-29 North, Range-16-West, M.P.M. Within the Wild and Scenic River Corridor, approximately 1.09 ha (2.71 acres) of easement area from the Flathead National Forest and about 1.24 ha (3.07 acres) of easement area from Glacier National Park must be acquired for the proposed bridge construction project. This proposed project would increase the total area devoted to US 2 within the Park (and the Wild and Scenic River Corridor) by 0.39 ha (0.97 acres). Lands within the Wild and Scenic River Corridor on both sides of the Middle Fork would be disturbed to construct the proposed bridge and its approaches.

The remainder of first paragraph under **Impacts of the Preferred Alternative** on page 32 would serve as a new second paragraph.

Page 2, 24 and elsewhere in the EA - Please state the number of new acres disturbed on both the United States Forest Service (USFS) and NPS sides of the river.

MDT's Road Design section estimated that approximately 2.36 acres fall within the construction limits on the USFS side of the river. It should be noted that the majority of this construction disturbance area consists of lands previously disturbed by road and bridge construction. On the NPS side of the river, the approximate area within the construction limits for the new bridge and its approach totals 1.29 acres. As with the USFS side, a considerable amount of this disturbance would occur over previously disturbed lands within Glacier National Park. The only "new" disturbance on NPS land would occur on about 0.33 acres immediately southwest of the existing bridge between the road and the river.

Please state the number of acres that would be rehabilitated as the result of the old bridge and its approaches being removed and rehabilitated.

As stated above, MDT would rehabilitate 0.54 acres of the area now authorized for US 2 located outside the requested new easement area and return it to Glacier National Park. The Agreement between MDT and NPS-Glacier National Park specifies that rehabilitation of disturbed areas will be performed on a total of 1.53 acres (0.62 ha) of bridge demolition area. This total includes both USFS and NPS land. Based on the 1.53 acres of the total rehabilitation area in the Agreement and the 0.54 acres of rehabilitation area on the NPS side of the river, then 0.99 acres of USFS land would be rehabilitated with this project.

Page 15 and 16 - We disagree with the conclusion that the preferred alternative minimizes impacts to Glacier National Park lands. Based on the information provided, the Bridge Rehabilitation Alternative appears to have fewer impacts to park lands than for the preferred alternative because there would be little, if any, new disturbance.

Bridge rehabilitation would have fewer impacts on Glacier National Park lands than other "build" alternatives. However, as the text on page 14 discusses, bridge rehabilitation does not meet the purpose and need for this project and it is not a viable action. This conclusion is supported by the text on page 5 that discusses MDT's past unsuccessful plans to rehabilitate the bridge and the inherent problems with the "fracture critical" design of the structure.

To strengthen the text describing the reasons why the Preferred Alternative was selected over other alternatives, two new bullet items will be added under **E. Preferred Alternative, 1. Reasons for Selection** stating:

...selected as the Preferred Alternative for the proposed action. This alternative was preferred to the others because:

- ☐ rehabilitating the existing bridge would not be an effective action or a wise expenditure of limited public funds and would not meet the purpose and

need for this project;

- ❑ Alternative A would require the unacceptable closure of U.S. Highway 2 or the use of a detour and temporary river crossing at another nearby site which could not be accomplished without notable adverse environmental effects;

We would change the first bullet item at the top of page 16 to read:

- ❑ the impacts to the Walton Ranger Station and other lands in Glacier National Park ~~are minimized~~ are less with this alternative than those associated with Alternatives A or B;

Page 30- Water Quality- For your information, while Total Maximum Daily Load (TMDL) standards may not have been established for the Middle Fork of the Flathead River, Flathead Lake does have a serious nutrient loading problem. TMDL standards developed for the lake depend on actions to reduce nutrient loadings in the Flathead River System of which the Middle Fork is a part. The Flathead Basin Commission (752-0081) is developing nutrient reduction strategies to help achieve TMDL standards, including the reduction of runoff from construction activities on or near the river's tributaries.

The text on page 30 will be supplemented by adding a new second paragraph that reads:

Although TMDL standards have not been established for the Middle Fork of the Flathead River, Flathead Lake does have a serious nutrient loading problem and is considered to be an impaired water body according to the MDEQ's 303(d) list. The Flathead Basin Commission, MDEQ, the Montana Department of Natural Resources and Conservation, and the Confederated Salish and Kootenai Tribes are currently working to create an effective plan to reduce levels of nutrients entering the lake through upstream and shoreline sources. The principal goals of this plan are to achieve established TMDLs for pollutants and remove Flathead Lake from the list of impaired water bodies. TMDL standards developed for Flathead Lake depend on actions to reduce nutrient loadings within the Flathead River system, including the Middle Fork. Such actions include the reduction of runoff from construction activities on or near the river's tributaries.

A new last sentence will also be added at the end of the third full paragraph on page 31 stating:

... proper design, implementation, and follow up actions, the BMPs would minimize erosion and the potential for sediments to enter surface waters. Efforts to control erosion and runoff from the construction zone would be consistent with efforts by the Flathead Basin Commission and others to reduce nutrient loadings within the Flathead River system and help achieve TMDL standards in Flathead Lake.

Page 32 - Impacts of the preferred alternative on the wild and scenic river - There should be discussion regarding the type of vegetation that will be removed by

construction activities, its habitat values, its scenic value and other considerations. In addition, will more structures be visible as the result of vegetation removal to accommodate new highway construction? To some degree, these questions are answered on page 46, but not in sufficient detail to make a complete evaluation of impacts.

The following paragraphs will be added to **7. Wild and Scenic Rivers. Impacts of the Preferred Alternative** in the EA.

According to the *Environmental Assessment and Assessment of Effect for the Walton Area Plan* prepared by the NPS in September 2000, the general habitat type of the park lands that would be affected by the proposed alternative is spruce/queencup beadrily forest. The NPS Environmental Assessment notes that area along US 2 near the entrance to the Walton Ranger Station is currently dominated by herbaceous, exotic species like timothy and spotted knapweed. Young cottonwood trees and some grasses dominate the riparian zone of the Middle Fork of the Flathead River in the vicinity of this project. The banks of the Middle Fork near the existing bridge are extremely rocky and do not support dense growths of vegetation. Mullein, and clover are common in previously disturbed areas associated with the dispersed recreation site and its access road. Few large trees exist on the bank area where the new south end of the bridge and highway approach would be constructed.

Virtually all trees and riparian vegetation would be removed in the area northeast of the new bridge to construct the US 2 approach and new segment of access road down the river bank to the dispersed recreation site on USFS land. This vegetation removal is necessary to accommodate the placement of fill for the new road and to place the gabion retaining wall. Additionally, trees and riparian vegetation would have to be cleared beneath north end of the new bridge. Few large trees exist on the bank area where the new south end of the bridge and highway approach would be constructed.

The proposed alignment for the new bridge and its approaches would likely require the removal of a few young cottonwoods and Douglas fir trees. Although these trees provide potential perching or roosting sites for resident and migrant bald eagles foraging along the river, their loss is not considered significant since similar habitat exists both up and downstream from the bridge site. MDT's Biological Resource Report documents for this proposed project indicate there are no known bald eagle nests or eagle roosts in the general project area. This statement is verified in the *Environmental Assessment and Assessment of Effect for the Walton Area Plan* prepared by the NPS in December 2000.

The vegetation affected by the proposed bridge replacement has limited value as habitat for wildlife. The primary species that would be affected would be small mammals and birds since vegetation that provides cover, nest sites, or other habitat for these species would be lost. Construction of the bridge and its approaches would temporarily displace such species to alternate nearby lands possessing the same habitats.

MDT performed a visual impact assessment for this proposed project (see **19. Visual**

Impacts later in this Part). The assessment concluded that although some minor adverse effects to visual quality would occur at viewpoints within or along the river corridor, the overall visual quality of the area would not be greatly affected by the proposed bridge replacement. With the proposed revegetation of disturbed areas, the overall natural appearance and scenic characteristics of the river would not be substantially changed over its present condition by this proposed project.

Currently, the only structures visible from the river are the bridge and its supports, one or two residences in Essex situated on the edge of a steep bluff northwest of the bridge, and possibly some NPS buildings at Walton. The vegetation removal required by this proposed project would not change this condition for river users.

Conclusion

The proposed action would have no foreseeable long-term adverse effects on the free-flowing nature, the setting, or the water quality of the Middle Fork Recreational River Corridor. The USFS Flathead National Forest coordinated with the NPS and prepared an analysis and determination of this proposed project's impacts in accordance with *Section 7 of the WILD AND SCENIC RIVERS ACT*. The analysis concluded that the proposed bridge replacement would not have any long-term significant effects on the free-flowing status or on the outstanding and remarkable values of the Middle Fork of the Flathead Wild and Scenic River. A copy of the agency's September 1999 analysis and relevant correspondence can be found in **APPENDIX B**. It should be noted that a new Section 7 Determination is being prepared by the USFS and should soon be available. MDT does not anticipate that the USFS would substantially change their overall conclusions about this project's effects on the Middle Fork of the Flathead Wild and Scenic River in the new Section 7 Determination.

At the request of the USFS, additional text was added to address the proposed actions effects on the Outstanding Remarkable Values attributed to the Middle Fork of the Flathead Wild and Scenic River.

Regarding the Memorandum of Agreement between Glacier National Park and Montana DOT for this project, it does not appear to include revegetation of the 3.08 acres of requested easement lands. The agreement needs to be modified to include these lands.

Revegetating the entire easement area being requested from Glacier National Park will not be necessary because road and bridge construction will occupy a considerable portion of the easement. The new foundation and pavement surfacing for the approach to the bridge, one of the bridge abutments, and riprap bank protection placed beneath the end of the new bridge would be constructed within the new easement area. If either MDT or the NPS is unclear about what area(s) must be revegetated, then revisions should be made to the Agreement to clarify the intended work.

Page 25 - The statement is made that no construction permits would be needed from within the Flathead National Forest or Glacier National Park, Please provide the

rationale for this conclusion.

Construction permits as discussed on Page 25 of the initial EA is a term commonly found on MDT Right-of-Way plans for highway projects. Construction permits are typically acquired (purchased) from landowners if there is a need to use some adjoining land during construction, but no permanent road feature would exist on the property after construction. The permit can be likened to "renting" land from a property owner for a stipulated period of time. Construction permits are typically used for slope reconstruction in areas that can be returned to the landowner, building approaches that extend more than 50 feet beyond the right-of-way, or to realign or reconstruct irrigation ditches outside the right-of-way. Since these needs do not exist on this project and all work can be accomplished within the requested easement area, construction permits are unnecessary.

Page 29 - The EA states there have been at least five 100-year floods on the Flathead River in the last century. The source of this information should be cited.

The general discussion on page 29 regarding historic flooding on the Middle Fork of the Flathead River was developed from a variety of sources including historic stream flow data on Flathead River system available from the U.S. Geological Survey, "The Canyon Plan" (a 1994 Amendment to the Flathead County Master Plan), and the "Environmental Considerations" section of the Columbia Falls Master Plan. Since the intent of the statement in question is just to convey the fact that major floods are not an uncommon occurrence within the Flathead River system and because multiple references were drawn upon to make the statement, we believe it is best to just delete the sentence in question.

Therefore, the text of the paragraph under **a) Flood History of the Middle Fork** will be revised as follows:

Large floods on the Middle Fork of the Flathead River are typically the result of heavy rainfall combined with snowmelt, although in some areas rainfall or snowmelt alone can be the cause of flooding. ~~There have been at least five "100-year" floods on the Flathead River in the last century.~~ Historic records of stream flow at gaging stations maintained by the U.S. Geological Survey show that widespread flooding occurred on the Middle Fork and most other streams in Flathead County during 1894, 1928, 1948, 1964, and 1975. Newspaper accounts.....

Page 30- Please indicate the approximate amount of material that would be excavated from the river bed.

The drilled shaft tip elevations at Piers 2, 3 and 4 (the piers within the river bed) would be 1121.071, 1121.021, and 1120.971, respectively. The channel bottom elevation at its lowest is about elevation 1138. The drilled shafts would be 3.048 meters in diameter and extend almost 17 meters below the channel bottom at these locations. The amount of material to be excavated from the river bed at Piers 2, 3, and 4 can be estimated by calculating the volume of each pier's cylindrical shape below the channel bottom. This volume calculation shows that approximately 124 cubic meters (or 162 cubic yards) of material would be excavated within the casing for each

drilled shaft. In total, about 372 cubic meters (486 cubic yards) of material would have to be excavated for the piers in the river bed. The excavated area below the river bed would be filled with reinforcing steel and concrete.

Page 31 - It should also be noted that a 402 (318) permit from the Montana Department of Environmental Quality would also be required.

A new sentence would be added near the end of the fourth full paragraph on page 31 stating that:

....ARMY CORPS OF ENGINEERS (COE). A 318 Authorization must also be obtained from the MDEQ for the minor, short-term increase in turbidity expected to occur in the Middle Fork during construction of the new bridge. These and other permit requirements

A new item would be added to the text under **23. Permits Required** stating:

318 Authorization - This proposed project would require a Short-Term Water Quality Standard for Turbidity Related to Construction (*318 Authorization*) under 75-5-318, M.C.A. from the MDEQ Permitting and Compliance Division.

Page 32 - Contains the statement that the contractor would be required to maintain a work bridge opening at least 9 meters wide near the center of the channel to accommodate floaters. When Glacier National Park did its work on the Quarter Circle Bridge, a boom was placed across the river to catch any potential spills. Without using a similar boom on this project, any spill material would be lost. Furthermore, on page 55 of the EA, potential spills are acknowledged which could and should be mitigated by the use of booms during construction.

The idea of maintaining an opening in the work bridge near the center of the channel was proposed by MDT as one means of mitigating impacts of this project on commercial rafting outfitters and other floaters that use this reach of river. The bridge reconstruction project will require that an existing put-in/take out point on the USFS side of the Middle Fork be closed for up to two construction seasons since it is one of the few (if not the only) locations near the work zone that can be used as a construction staging area. Maintaining an opening in the work bridge and installing warning signs upstream are necessary measures to ensure the safety of the limited floating activity expected in this area during bridge construction.

We acknowledge the NPS's concerns and suggested use of a boom to contain potential spills. However, we believe that placing a boom(s) across the river downstream from the existing bridge would severely inhibit if not stop floating entirely in this area. We also question whether a boom would be effective at containing a spill given the fast moving, choppy water in the Middle Fork. We are also concerned over the visual impacts of placing such a device within clear view of road users, park and forest visitors, and local residents.

The environmental permits for this project will specify terms and conditions necessary to protect water quality. Additionally, we expect the outcome of formal consultation with the U.S. Fish and Wildlife Service to identify measures needed to conserve and protect bull trout and aquatic

habitat.

Please send Glacier National Park a copy of the Biological Assessment for this project.

Due to the duration of this project, MDT's Biological Assessment is comprised of a variety of documents. This information has been compiled and was sent to Glacier National Park.

Although we understand that you are going into formal consultation with the USFWS, we have concerns about the impact of blasting on bull trout and the aquatic community. The impact analysis in the EA did not adequately address these activities.

Text on pages 38 and 39 disclosed that blasting could potentially affect bull trout. Demolition of the old bridge may require blasting to reduce the existing concrete piers to rubble to facilitate their removal. This activity could injure or kill bull trout or other fish species in the immediate vicinity of the pier being demolished. This and other in-stream activities associated with the construction of a new bridge have the unlikely (but possible) potential for causing a "take" of bull trout. This unavoidable consequence of conducting work in occupied bull trout habitat is why formal consultation with this USFWS has been requested. We anticipate that the USFWS will suggest measures that can be incorporated during bridge demolition that will minimize potential adverse effects on bull trout and other aquatic species.

A new third and fourth paragraph discussing the impacts of blasting to other fish species will be added to the text under **d) Fisheries, Impacts of the Preferred Alternative**. The paragraph will read as follows:

Demolition of the old bridge may require blasting to reduce the existing concrete piers to rubble to facilitate their removal. Blasting would have short-term adverse effects on fish and other aquatic organisms and their habitats. The shock waves and rapid changes in hydrostatic pressure associated with the detonation of explosives in or near water could stun, injure or kill bull trout and/or other fish species in the immediate vicinity of the demolition activity. The use of explosives may also cause some temporary changes to fish habitat. Blasting to demolish piers could elevate sediment levels downstream from the piers and may reduce or eliminate bottom-dwelling life forms that some fish use for food. The use of explosives to demolish bridge piers would not introduce chemical by-products into the river at concentrations that would be toxic to fish and other aquatic biota.

Measures that could reduce the potential for blasting to adversely affect bull trout and other aquatic species include controlling the blast with blankets or mats to contain debris and blasting when bull trout abundance in the Middle Fork is lowest. Demolition of the piers could be done without blasting but it would likely lengthen the time required to remove piers, require the use of heavy demolition equipment, cause additional noise and vibration effects, potentially introduce hazardous substances into the river, and would be substantially more expensive than blasting. Alternate demolition methods might in some way also pose a risk to bull trout and other fish near the piers being removed.

MDT will also revise the first bullet item under **d) Fisheries, Mitigating Measures** to read:

- MDT has already coordinated proposed work in the stream channel with the MDFWP, USFS, and the USFWS. Continued coordination would occur to establish desirable times and any other special requirements for construction activities within the channel (including blasting to demolish existing bridge piers) that might ~~increase turbidity or~~ cause harm to aquatic species or their aquatic habitats.

Page 39 and 40 - Please provide information as to where the settling pond would be located.

The small settling pond area would be located under and to the downstream side of the bridge. The settling pond area would be formed by fill material for the access road. The runoff from the road and end of the bridge would drain to the ditch between the access road and the abutment slope. The raised inlet of the cross drain under the access road would allow sediments to settle before flowing into the river.

Page 44 - The chart lists bull trout as common. This appears contrary to the fact that bull trout is federally listed on the threatened and endangered species list.

The information presented in the chart on page 44 of the EA was obtained from the Montana Rivers Information System (MRIS) database maintained by the Montana Department of Fish, Wildlife & Parks (MDFWP). The MRIS reports fish distribution for all surveyed streams in Montana. Distribution includes game species, non-game species and native species of special concern. Fields included on the MRIS database for each species listed include a relative abundance assigned by the biologist collecting the sample, a stream use by the species (if known), and a data quality rating. The term "common" is a subjective rating used by the MDFWP to indicate the frequency that bull trout might occur in this reach of the Middle Fork based on past sampling efforts.

In response to your comment, we have included additional text to denote that bull trout are a listed species. We've also indicated that westslope cutthroat trout have been considered for listing but the USFWS determined the species did not warrant listing at this time.

Page 44- References are made to the use of Ole Creek and other tributaries by bull trout and cutthroat trout. It should also be noted that both species use the Middle Fork of the Flathead River itself and tributaries both above and below the project.

The sentence preceding the chart at the top of page 44 indicates that bull trout and westslope cutthroat are found in the Middle Fork of the Flathead River. At your request, the highlighted sentence below will be added to the second paragraph under Impacts of the Preferred Alternative on page 44:

Bull trout and westslope cutthroat trout are very sensitive to sediment, particularly in spawning areas. These species primarily spawn in tributaries to the Middle Fork such as Ole Creek located downstream of the proposed project. Both species use the Middle Fork of the Flathead River itself and tributaries both above and below the project area.

The noise analysis on page 47 should acknowledge the short-term impacts to visitors and wildlife during construction.

Construction impacts are discussed on page 55. To comply with your comment, a statement will be added to the paragraph under Noise and Vibration that say:

".....would create periods of undesirable noise in the project area. Noise due to construction activities would produce short-term impacts for visitors at dispersed and/or developed recreation sites within Flathead National Forest and Glacier National Park. Construction-related noise may also temporarily displace some wildlife and bird species from the area or deter such species from using habitats in the vicinity of the bridge Pile driving activities associated"



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240



ER 00/788

OCT 24 2000

Janice W. Brown, Division Administrator
Montana Division Office
Federal Highway Administration
2880 Skyway Drive
Helena, Montana 59602

Dear Ms. Brown:

This letter contains the Department of the Interior's comments and concerns on the Environmental Assessment and Nationwide Programmatic Section 4(f) Evaluation on the Middle Fork Flathead River - SE Essex BR 1-2 (85) 180 Flathead County, Montana.

We appreciate the opportunity to provide these review comments. As you know, we only recently received the document after notification from Glacier National Park. They informed us that the appropriate Section 4(f) Evaluation and Review had not taken place. Under standard review processes, the Department of the Interior should have received copies of the document for review. We have no record of receiving these copies, nor does your distribution list indicate that we were sent a copy when the Environmental Assessment (EA) was released for public review and comment.

SECTION 4(F) COMMENTS

We are concerned that the 4(f) evaluation fails to consider impacts of the use of parkland from Glacier National Park. Neither the EA nor the Section 4(f) Evaluation for this project specifically address the loss of National Park Service (NPS) lands. Instead, the evaluations address the project's effects on the Walton Ranger Station Historic District and on the Middle Fork of the Flathead River, as a Wild and Scenic River. The reason stated in the EA on page 59 is that the Surface Transportation and Uniform Relocation Assistance Act of 1987 (PL 100-17) exempts "roads located within or providing access to National Parks from the provisions of Section 4(f)."

We disagree that this provision applies to the proposed highway construction. The language of PL 100-17 as codified in Section 303 of Title 49 establishes a limited exemption for park roads or parkways funded under section 204 of title 23. Section 204 of title 23 is the provision establishing funding for the Federal Lands Highway Program. To our knowledge, the proposed project is not being funded under that program. As a result, a Section 4(f) Evaluation must be prepared to cover the lands that you are requesting an easement for from Glacier National Park. Furthermore, for the National Park Service to consider this request, the EA must analyze the impacts of this project on

those lands, and the 4(f) evaluation must be prepared and identify mitigation for this easement request. Mitigation measures must address enhancement, preservation and restoration of NPS lands in Glacier National Park.

The above must be completed before Glacier National Park can complete action on your proposed application for easement which we understand was received by the park on May 18, 2000. According to NPS procedures contained in Director's Order 87, the NPS cannot send a letter of consent or denial on the right of way or easement request until all relevant environmental evaluation and analysis has been completed.

Furthermore on page 25 the document references both a right-of-way and an easement that would be required from Glacier National Park. Please clarify what you are seeking from Glacier National Park, as the procedures for processing these requests are different.

Both the EA and Section 4(f) Evaluation fail to indicate what lands would be returned to Glacier National Park in exchange for the easement or right-of-way. If the roadway is moved from the Walton Ranger District, these lands could then become federal lands managed and owned by the National Park Service. The Final EA must address the disposition of these lands.

ENVIRONMENTAL ASSESSMENT COMMENTS

Page 31 indicates that the entire project falls within the Wild and Scenic River corridor. However, the analysis in the EA and Section 4(f) Evaluation do not include the park lands that fall within the Wild and Scenic River corridor as well. These lands must be included in the EA as well as the Section 4(f) Evaluation on the Wild and Scenic River.

Page 2, 24 and elsewhere in the EA – Please state the number of new acres disturbed on both the United States Forest Service (USFS) and NPS sides of the river. Please state the number of acres that would be rehabilitated as the result of the old bridge and its approaches being removed and rehabilitated.

Page 15 and 16 – We disagree with the conclusion that the preferred alternative minimizes impacts to Glacier National Park lands. Based on the information provided, the Bridge Rehabilitation Alternative appears to have fewer impacts to park lands than for the preferred alternative because there would be little, if any, new disturbance.

Page 30–Water Quality–For your information, while Total Maximum Daily Load (TMDL) standards may not have been established for the Middle Fork of the Flathead River, Flathead Lake does have a serious nutrient loading problem. TMDL standards developed for the lake depend upon actions to reduce nutrient loading in the Flathead River System of which the Middle Fork is a part. The Flathead Basin Commission (752-0081) is developing nutrient reduction strategies to help achieve TMDL standards, including the reduction of runoff from construction activities on or near the river's tributaries.

Page 32 - Impacts of preferred alternative on the wild and scenic river - There should be discussion regarding the type of vegetation that will be removed by construction activities, its habitat value, its scenic value, and other considerations. In addition will more structures be visible as the result of vegetation removal to accommodate new highway construction? To some degree these questions are answered on page 46, but not in sufficient detail to make a complete evaluation of impacts.

Regarding the Memorandum of Agreement between Glacier National Park and Montana DOT for this project, it does not appear to include revegetation of the 3.08 acres of requested easement lands. The agreement needs to be modified to include these lands.

Page 25 - The statement is made that no construction permits would be needed within from the Flathead National Forest or Glacier National Park. Please provide a rationale for this conclusion.

Page 29 - The EA states that there have been at least five 100 year floods on the Flathead River in the last century. The source of information for this should be cited.

Page 30 - Please indicate an approximate amount of material that would be excavated from the river-bed.

On page 31 - It should also be noted that a 402 (318) permit from Montana Department of Environmental Quality would also be required.

On page 32 - Contains the statement that the contractor would be required to maintain a work bridge opening at least 9 meters wide near the center of the channel to accommodate floaters. When Glacier National Park did its work on Quarter Circle Bridge, a boom was placed across the river to catch any potential spills. Without using a similar boom on this project, any spill material would be lost. Furthermore on page 55 of the EA, potential spills are acknowledged which could and should be mitigated by the use of booms during construction.

Please send Glacier National Park a copy of the Biological Assessment for this project.

Although we understand that you are going into formal consultation with the USFWS, we have concerns about the impacts of blasting on bull trout and the aquatic community. The impact analysis in the EA did not adequately address these activities.

Page 39 and 40 - Please provide information as to where the settling pond would be located.

Page 44 - The chart lists bull trout as common. This appears contrary to the fact that bull trout is federally listed on the threatened and endangered species list.

Page 44 - References are made to the use of Ole Creek and other tributaries by bull trout

and cutthroat trout. It should also be noted that both species use the Middle Fork of the Flathead River itself and tributaries both above and below the project.

The noise analysis on page 47 should acknowledge the short-term noise impacts to visitors and wildlife during construction.

We apologize for sending in these comments at this late date. However the issues with the Section 4(f) Evaluation and your request for an easement from Glacier National Park demand that we follow our agency procedures in processing and making a final determination to best protect and conserve Glacier National Park lands.

Sincerely,

A handwritten signature in dark ink, reading "Willie R. Taylor". The signature is fluid and cursive, with the first name "Willie" and last name "Taylor" clearly legible. The middle initial "R." is smaller and positioned between the first and last names.

Willie R. Taylor
Director, Office of Environmental
Policy and Compliance

cc: Joel M. Marshik, P.E.
Environmental Services Manager
Montana Department of Transportation
2701 Prospect Avenue
P.O. Box 201001
Helena, Montana 59620-1001

National Park Service - Glacier National Park October 12, 2000 Letter

Written comments on aspects of the initial EA were submitted to Merlin Voegelé of the FHWA's Montana Division Office by Denis Davis on behalf of Suzanne Lewis, Superintendent of Glacier National Park in a letter dated October 12, 2000. Key comments from the letter are shown below in ***bold and italicized text*** followed by appropriate responses.

1. ***The environmental assessment indicates that after reconstruction of the new 3.08 acre alignment across National Park Service land, the highway on the old alignment will be removed and the underlying land rehabilitated. Will the highway right-of-way for this abandoned alignment be terminated?***

MDT is seeking to obtain an easement across Glacier National Park land for highway purposes. According to a 1988 "Letter of Authorization" from Glacier National Park, the area presently occupied by US 2 within Glacier National Park is not part of a formal easement or dedicated right-of-way. Instead, MDT has been authorized by the NPS to operate and maintain US 2 on about 2.10 acres of Glacier National Park land within the project area. Considering the area of this existing authorization and MDT's anticipated right-of-way needs of 3.07 acres, this proposed project would increase the total area devoted to US 2 within the Park by some 0.97 acres.

The 3.07 acres of easement area being requested would include a portion of the existing easement area for the highway and additional NPS land required for the construction of the new bridge and its easterly approach. Approximately 0.54 acres of park lands currently authorized for US 2 would no longer be required for highway purposes and would be restored to a natural condition.

MDT will remove the existing structure and approach fills, grade the area to match adjacent ground contours, and place topsoil on the obliterated areas within the requested 3.07-acre easement.

What is the ratio of acres rehabilitated vs. new acres of parkland disturbed?

The construction limits (the area of disturbance) for this proposed bridge replacement encompasses an estimated 1.29 acres of NPS land. Much of this disturbance would occur on NPS lands previously disturbed by road and bridge construction and utility installations. MDT estimates that 0.54 acres of NPS land would be restored to a natural condition and no longer needed for maintenance of US 2. Based on these areas, about 0.41 acres would be rehabilitated for each 1.00 acre of disturbance area.

The taking of parkland for any purpose is a significant issue; thus we would be interested in discussing with you the possibility of further mitigating actions associated with this project that restore or enhance park lands.

FHWA and MDT recognize the significance of taking this parkland. For this reason, MDT has involved the NPS as a Cooperating Agency in planning and design efforts for the Middle Fork of the Flathead River crossing since the early 1990's when only deck rehabilitation work was

proposed for the structure. When the scope of project changed from rehabilitation to replacement in late 1996, the NPS was asked to reaffirm their intention to serve as a Cooperating Agency for this project. NPS been afforded opportunities to comment and concur with preliminary environmental documents and design plans for the project and attend key meeting held over the development of this project.

FHWA and MDT met with staff from Glacier National Park on November 3, 2000 to discuss modifications and additions to the existing *Section 4(f)* Evaluations and to determine acceptable mitigation for *Section 4(f)* impacts. As a result of this meeting, MDT agreed to prepare a "Nationwide" *Section 4(f)* Evaluation for affected Glacier National Park lands and supplement discussions in the EA to address other comments submitted by the NPS and the U.S. Department of the Interior Office of the Secretary. It was also agreed that the initial EA would be revised and again made available for public review. MDT, FHWA and Glacier National Park staff also discussed in principle measures that would preserve, enhance and restore park land as mitigation for 4(f) impacts.

2. *This agency cannot act on this right-of-way request until such time as the Section 4(f) Evaluation(s) for the project has been approved by the National Park Service and the EA and FONSI for the project have been finalized. The NPS is now assembling comments on the EA and Section 4(f) Evaluation.*

MDT acknowledges your comments.

3. *Neither of the Section 4(f) Evaluations for this project specifically address the loss of Glacier National Park lands. Instead, they address the project's effects on the Walton Ranger Station Historic District and on the Middle Fork of the Flathead Recreational River.*

Your comment is correct. However, the initial EA distributed with the 4(f) evaluations discusses at length effects on both NPS and USFS lands.

Based on comments submitted by both the NPS and the U.S. Department of the Interior Office of the Secretary, the EA and *Section 4(f)* Evaluations will be revised to specifically address Glacier National Park lands and the project's potential effects to these lands.

The EA states that the reason for omitting Glacier National Park lands from a Section 4(f) Evaluation is that Public Law 100-17 "exempts roads located within or providing access to National Parks from the provisions of Section 4(f)." This appears contrary to recent instructions regarding Non-NPS Federal Aid Roads wherein the NPS Director has stated that we are to treat all lands within the National Park system as being nationally significant for Section 4(f) purposes. We have asked for clarification on this matter from MDT and may seek advice from our solicitors as well. In order to avoid potential litigation, the best course of action on this issue may well be to proceed with a Section 4(f) Evaluation on Glacier National Park lands.

We concur that Section 4(f) exemption referred to in the EA text is inappropriate. References to

this exemption on pages 48 and 59 in the initial EA will be eliminated. As indicated earlier in the responses, FHWA and MDT have already met with staff from Glacier National Park on November 3, 2000 to discuss modifications and additions to the existing *Section 4(f)* Evaluations and to discuss acceptable mitigation in principle for *Section 4(f)* impacts. MDT has agreed to prepare a "Nationwide" *Section 4(f)* Evaluation for affected Glacier National Park lands and supplement discussions in the EA to address other comments submitted by the NPS and the U.S. Department of the Interior Office of the Secretary.



IN REPLY REFER TO

L3027

United States Department of the Interior

NATIONAL PARK SERVICE

Glacier National Park
West Glacier, Montana 59936

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OCT 12 2000

RECEIVED

OCT 16 2000

ENVIRONMENTAL

Mr. Merlin J. Voegele
Federal Highway Administration, Montana Division
2880 Skyway Drive
Helena, Montana 59602

Re: BR 1-2(85)180: Middle Fork Flathead River - SE Essex

Dear Mr. Voegele:

Glacier National Park has reviewed the application for a 3.08 acre easement for a highway right-of-way on National Park Service land. This easement is needed for the construction of a new bridge across the Middle Fork of the Flathead River near Essex, Montana.

The National Park Service cannot concur in the granting of a highway easement deed for this project until a number of the issues have been clarified and resolved.

- The environmental assessment indicates that after reconstruction of the new 3.08 acre alignment across National Park Service land, the highway on the old alignment will be removed and the underlying land rehabilitated. Will the highway right-of-way for this abandoned alignment be terminated? What is the ratio of acres rehabilitated vs. new acres of parkland disturbed? The taking of park land for any purpose is a significant issue; thus, we would be interested in discussing with you the possibility of further mitigating actions associated with this project that restore or enhance park lands.
- This agency cannot act on this right-of-way request until such time as the Section 4 (f) Evaluation(s) for the project has been approved by the National Park Service and the Environmental Assessment (EA) and Finding of No Significant Impact for the project have been finalized. The National Park Service is now assembling comments on the Environmental Assessment and Section 4(f) Evaluation. These comments should be submitted to both your agency and the Montana Department of Transportation shortly.
- Neither of the Section 4(f) Evaluations for this project specifically address the loss of Glacier National Park lands. Instead, they address the project's affects on the Walton Ranger Station Historic District and on the Middle Fork of the Flathead Recreational

River. The EA states that the reason for omitting Glacier National Park lands from a Section 4(f) Evaluation is that Public Law 100-17 "exempts roads located within or providing access to National Parks from the provisions of Section 4(f)". This appears contrary to recent instructions regarding Non-NPS Federal Aid Roads wherein the NPS Director has stated that we are to treat all lands within the national park system as being nationally significant for Section 4(f) purposes. We have asked for clarification on this matter from the Montana Department of Transportation and may seek advice from our solicitors as well. In order to avoid potential litigation, the best course of action on this issue may well be to proceed with a Section 4(f) evaluation on Glacier National Park lands.

Please accept my apologies for Glacier National Park's delay in responding to your original request for a right-of-way. The delay is due largely to staff changes and the reassignment of responsibilities. These inefficiencies are now behind us and we are eager to move forward on this request and to working with you and your staff on the issues identified above.

The park's primary contact for this project is Mary Riddle. Please do not hesitate to give Mary a call at (406) 888-7898 as questions arise.

Sincerely,



for Suzanne Lewis
Superintendent

cc:

Joel M. Marshik, Environmental Services, MDOT
John Horton, Right-of-Way Bureau, MDOT

